Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

12/22/2011

Certified Mail

Facility ID: 1431070039
Permit Number: P0098040
County: Hamilton

Mr. Brian Bokovoy
Emerald Performance Materials, LLC
2235 Langdon Farm Rd.
Cincinnati, OH 45237-4712

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 11/3/2011. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. 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 permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Hamilton County Dept. of Environmental Services

Response to Comments

Facility ID:	1431070039
Facility Name:	Emerald Performance Materials, LLC
Facility Description:	Manufacturer of Dyes and Pigments
Facility Address:	2235 Langdon Farm Rd. Cincinnati, OH 45237-4712 Hamilton County
Permit:	P0098040, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Cincinnati Enquirer on 11/07/2011. The comment period ended on 12/07/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: Statement of Basis

Comments: See below.

Emission Unit B009

The emission rate stated as 0.021 lb PE/MMBtu is incorrect. The correct emission rate for B009 is 0.21 lb PE/MMBtu.

Emission Unit(s) P495, P496, P497, P498, P500, P501, P506, P507

It appears that the comments section incorrectly states that "Visible particulate emissions from <u>any stack</u> shall not exceed 20% opacity…." The OAC Rule 3745-17-07(B)(1) states "…from <u>any fugitive source</u>…" rather than a stack. This statement also needs to be corrected in the specific terms of each emission unit under the applicable requirements column. Examples include: P495 page 86, P496 page 94, P497 page 102, P498 page 110, P500 page 127, P506 page 151, and P507 page 151.

Response: The Statement of Basis is a non-enforceable summary document issued with the Draft Title V Permit only. The changes noted above will be addressed at the next permit renewal.

2. Topic: Page 17, Term B.2.

Comment: See below.

Page 17, Term B.2.

Emission unit B010 is incorrectly identified as a coal boiler within the list of source-wide emission units included for calculating the HAPs 12-month rolling summations. The correct identification for B010 is "119.4 MMBtu/hr natural gas/No.2 fuel oil-fired boiler." Fuel oil is intended for curtailment usage oil.

Response:The change requested above will be made in the Preliminary Proposed Permit (PPP).

3. Topic: Page 19, Term B.11

Comment: See below.

Two additional Area Source MACT Rules must be listed as being applicable to the subject-site, including:

Stationary Reciprocating Internal Combustion Engines, 40 CFR Part 63 Subpart ZZZZ; and

Chemical Manufacturing Area Sources, 40 CFR 63 Subpart VVVVVV.

Both of these area source rules were recently finalized, however, the initial compliance dates for each rule applicable to existing emission units is forthcoming.

Response: The additional Area Source MACT standards will be added to the Preliminary Proposed Permit (PPP).

4. Topic: Page 36, Emission Unit P154

Comment: See below.

Please provide clarification regarding the use of OC emissions rather than VOC emissions. Consistent with other areas of the Permit, VOC appears to be appropriate.

Response:PTI 14-02096 (modification issued 8/3/2004) established an emission limitation for Organic Compounds (OC) vs. Volatile Organic Compounds (VOC). The permit as written is correct. OC and VOC are both defined in OAC rule 3745-21-01. There are several Federal and State regulation based reasons for the establishment of OC vs. VOC in a Permit to Install.

5. Topic: Page 45, Emission Unit(s) P476, P477, P479, and P482, Term (d)(5)

Comment: See below.

The OAC reference to the Chapter 31 definition of "modification" appears inaccurate. It appears that the OAC paragraph referenced should be changed to "QQQ" rather than "VV". This change will also apply to all sources throughout the entire Permit that have the "Air Toxic Policy" language terms.

Response:The change requested above will be made in the Preliminary Proposed Permit (PPP).

6. Topic: Page 85, Emission Unit P495, Term (b)(1)(a) and (b)

Comment: See below.

The issue date is missing from the PTI reference number. Please revise these terms to "(PTI 14-05390 issued 6/17/2003)".

Response:The change requested above will be made in the Preliminary Proposed Permit (PPP).

7. Topic: Page 177, Emission Unit P514 Description

Comment: See below.

Emerald recommends that Ohio EPA change the DAPC description in the e-Business Air Services Facility Profile and the TV permit from "Mulch colorant dispersion media" to "Pigment and Dispersion Process". This reflects the description in the e-Business Air Services Facility Profile, and more recent Permit-to-Install changes.

Response:The equipment description in the PPP was modified. Emerald Performance Materials, LLC is responsible for Facility Profile Updates.

8. Topic: Emission Unit B010, 119.4 MMBtu/hr Natural Gas/No. 2 Fuel Oil-Fired Boiler

Comment: See below.

The Area Source Boiler MACT applies to B010 because the air permit does not include any federally enforceable operational restrictions that limit fuel oil usage in a manner to preclude this boiler from this MACT rule. Emerald is electing to preclude B010 from the Area source Boiler MACT by restricting fuel oil usage. Emerald is requesting the addition of a federally enforceable operational restriction permit term to state "To preclude from the applicability of 40 CFR Part 63 Subpart JJJJJJ, the permittee shall only combust distillate oil in B010 during periods of gas curtailment, gas supply emergencies, or for periodic testing not to exceed 48 hours during any calendar year; as defined in 40 CFR 63.11237."

Response:Federally Enforceable restrictions, as those requested above, cannot be established under the Title V Permit to Operate program. Should Emerald Performance Materials, LLC wish to establish the above referenced Federally Enforceable restrictions, a Permit to Install Application should be submitted. Voluntary Federally Enforceable restrictions may be established under OAC rule 3745-31-05(F) as noted below.

<u>3745-31-05(F) Voluntary limits on allowable emissions</u>

<u>The owner or operator of any air contaminant source may apply for a permit-to install or PTIO to voluntarily limit the allowable emissions from the air contaminant source or limit the type of air contaminants authorized to be emitted from the air contaminant source. The director shall act upon such application in accordance with the requirements of this rule, provided that paragraphs (A)(3) and (I) of this rule shall not apply unless the application is for the installation of a new source as defined by rule 3745-31-01 of the Administrative Code or is for a modification of an air contaminant source as defined by rule 3745-31-01 of the Administrative Code.</u>

9. Topic: Emission Unit B009, 90 MMBtu/hr Traveling Grate Coal-Fired Boiler; Page 29 Term (f)(1)(b), Timing of the Required Stack Emission Tests

Comment: See below.

During calendar year 2011, the operation of the coal boiler B009 was extremely limited due to economic reasons in which low natural gas prices made operating the gas boilers (B007 and B010) more cost-effective than burning coal. Based upon current fuel pricing, Emerald will continue to operate alternate existing natural gas-fired boilers (B007, B010) for the foreseeable near-term future unless the price of natural gas increases substantially. Emerald understands the importance of conducting stack tests to demonstrate compliance with the air permit emission limitations. For that reason, Emerald is proposing to change the timing of the required stack testing identified in term (f)(1)b to state "The emission testing shall be conducted within six-months after the effective date of this permit or within 90 days of restarting the boiler following the economic shutdown that commenced 11/25/2011, whichever is later. The emission testing shall also be conducted within six-months of permit expiration, or, if the boiler continues to be in economic shutdown, the permittee may request the Director change this testing requirement pursuant to OAC Rule 3745-15-04."

Response: The stack testing frequency was modified as noted below:

<u>The permittee currently does not operate emission unit B009. Should the permittee recommence with the operation of emission unit B009, the permittee shall conduct, or have conducted, emission testing for this emissions unit within 90 days after restart-up in accordance with the following requirements.</u>

<u>Should the permittee recommence with the operation of emission unit B009 and a stack test be conducted, future stack test may be required on a frequency established by Ohio EPA Engineering Guide 16.</u>

10. Topic: Emission Unit B009, 90 MMBtu/hr Traveling Grate Coal-Fired Boiler; Page 24 Terms (d)(1)(a) and (d)(2) and Page 29 Term (f)(1)(a) HCl Compliance Demonstration Methods

Comment: The permittee requested the chlorine content testing requirement to determine HCl emissions be removed and replaced with an alternative compliance option.

Response: PTI 14-05325 established federally enforceable emission limitations for HCl of 0.044 lb/MMBtu of actual heat input and 8.9 tons per year based on a rolling 12-month summation. Emerald Performance Materials, LLC is required to demonstrate continued compliance with these limitations.

The HCl emissions from the combustion of coal is directly related to the chlorine content of the coal. There is <u>significant</u> variability of the chlorine content in coal. Therefore, there is significant variability in the HCl emissions. The Title V monitoring and recordkeeping was established to be able to demonstrate ongoing compliance with the federally enforceable HCl emission limitations noted in the permit.

Emerald Performance Materials LLC presented other options for the determination of HCl emissions. Those options and our agency's concerns with those options are noted below.

<u>Option</u>

Use the AP - 42 emission factor for HCl of 1.2 lbs HCl/ton of coal (.05 lbs/MMBtu).

Concerns

This 14 year old emission factor does not take into consideration the significant variability of the chlorine content of coal. When an average BTU content of 12,000 BTU/lb of coal is used an emission rate of .05 lb HCl/MMBtu results. This emission factor shows a violation of the lb/MMBtu emission limitation of 0.044 lbs/MMBtu.

Option

Stack Testing for HCl to determine an HCl emission rate.

Concerns

A one- time stack test for an uncontrolled boiler is not adequate to demonstrate ongoing compliance with the HCl emission limitations. As noted above, the HCl emissions are directly related to the chlorine content of the coal and there is significant variability in the chlorine content of different coals. The testing of the chlorine content of coals to properly calculate the HCl emission rate is a very similar approach as testing the sulfur content of coal to determine the SO2 emission rate.

To help clarify the chlorine content testing requirements and the HCl emission rate calculations, term and condition d)(2) was modified as noted below.

d)(2) To determine the hydrochloric acid emissions from this emissions unit, the permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with the procedures specified ASTM method D2234, Standard Practice for Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample. The composite sample shall be prepared using the procedures specified in ASTM D2234-D2234M-03.

Each monthly composite sample of coal shall be analyzed for, chlorine concentration (lbs per million Btu) and heat content (Btu/pound of coal). ASTM D5865-04 shall be used to determine heat content, and SW-846-9250 or ASTM D6721-01 shall be used to determine the chlorine concentration. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

The permittee shall calculate the HCl emission rate in pounds per million Btu for the monthly composite sample referenced above. The HCl emission rate shall be calculated as specified below.

*HCl = (Chlorine concentration * 1.028)*

where

HCl = HCl emission rate in units of pounds per million Btu

Chlorine concentration = the chlorine concentration of the monthly composite sample in lbs per million BTU

1.028 = Molecular weight ratio of HCl to chlorine

Authority for term: (OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

Ohio | Environmental Protection Agency

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Emerald Performance Materials, LLC

Facility ID:	1431070039
Permit Number:	P0098040
Permit Type:	Renewal
Issued:	12/22/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Emerald Performance Materials, LLC

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Authorization

Facility ID: 1431070039
Facility Description: Manufacturer of Dyes and Pigments
Application Number(s): A0029699, A0029700, A0038597
Permit Number: P0098040
Permit Description: Renewal Title V permit for the manufacture of intermediates and dispersions (pigments) used in the paints, inks, and food coloring manufacturing industries which includes the following types of emissions units: boilers to provide steam to their operations, a waste water pretreatment operation, numerous controlled ball and mill operations that make pigments, mixing tank operations, along with spray painting operations, and liquid storage tanks.
Permit Type: Renewal
Issue Date: 12/22/2011
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0098039

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Emerald Performance Materials, LLC
2235 Langdon Farm Rd.
Cincinnati, OH 45237-4712

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Hamilton County Dept. of Environmental Services. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Hamilton County Dept. of Environmental Services.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the

Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; orthe permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(2) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(3) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that

qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

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

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

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

25. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

26. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air

agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

27. Permit Transfers

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

(Authority for term: OAC rule 3745-77-01(C))

28. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

   Terms and Conditions B.2-B.9 below are synthetic minor limitations established under OAC rule 3745-31-05(D) and Permit to Install 14-05390.

2. The total allowable emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units B007 (37.2 MMBtu/hr natural gas-fired boiler), B009 (90 MMBtu/hr traveling grate coal-fired boiler controlled with a multiclone), B010 (119.4 MMBtu/hr natural gas/No.2 fuel oil-fired boiler), P154 (wastewater pretreatment (plant wide) controlled with Carbon adsorption system), P476 (Ball Mill A), P477 (Ball Mill B), P478 (Ball Mill C), P479 (Ball Mill D), P480 (Ball Mill E), P481 (Ball Mill F), P482 (Ball Mill G), P483 (Ball Mill L), P484 (High Speed Disperser 1), P485 (High Speed Disperser 2), P486 (High Speed Disperser 3), P487 (High Speed Disperser 4), P488 (High Speed Disperser 5), P489 (High Speed Disperser 6), P490 (High Speed Disperser 7), P491 (High Speed Disperser 8), P492 (High Speed Disperser 9), P493 (High Speed Disperser 10), P494 (High Speed Disperser 11), P495 (Drais Mill 1 DR), P496 (Drais Mill 2 DR), P497 (Drais Mill 3 DR), P498 (Drais Mill 4 DR), P499 (Pony Mixer 1), P500 (Double Post Mixer), P501 (Pony Mixer 3), P502 (Roll Mill 1, P504 (Roll Mill 3), P505 (Roll Mill 4), P506 (Roll Mill 5), P507 (Roll Mill 6), P512 (Oil-based carbon dispersion process), P513 (Water-based carbon dispersion train), P514 (Mulch colorant dispersion media), P515 (Mill Set A, Building 10), P516 (Mill Set B, Building 10), including any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and permanent exemption air contaminant sources shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

3. The permittee shall collect and record the following information each month:

   a) The monthly single HAP emissions from all facility emissions units contained in B.2. combined, in pounds, for each single HAP.

   a) The rolling, 12-month summation of single HAP emissions, in tons, from all facility emissions units defined in B.2. combined calculated as below for each single HAP:

      The rolling, 12-month summation of single HAP emissions = [monthly single HAP emissions from a) + sum of monthly single HAP emissions from previous 11 calendar months] ÷ 2000.

   b) The monthly total HAPs (sum of all single HAPs) emissions from all facility emissions units defined in B.2. combined, in pounds.

   c) The rolling, 12-month summation of total HAP (sum of all single HAP) emissions, in tons, from all facility emissions units defined in B.2. combined calculated as below):

      The rolling, 12-month summation of total HAP [sum of all single HAP emissions = ((monthly total HAP emissions from c) + sum of monthly total HAP emissions from previous 11 calendar months) ÷ 2000))].

4. The permittee shall submit quarterly deviation (excursion) reports of any exceedance of the HAP emission limitations outlined in B.2. If no exceedances occurred, the permittee shall state so in the report.

5. Emission Limitations:

   9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling 12-month summation for the emissions units defined in B.2.

   Applicable Compliance Method:

   Compliance with the HAP emission limitations shall be demonstrated by the record keeping requirements specified in B.3.

6. The total allowable emissions of Volatile organic Compounds (VOC) from emissions units listed in B.2. shall not exceed 99.9 TPY to avoid OAC 3745-21-14. Compliance with the above limitations shall be based on a rolling, 12-month summation.

7. The permittee shall collect and record the following information each month:

   a) The monthly VOC emissions from all facility emissions units defined in B.2. combined, in pounds.

   b) The rolling, 12-month summation of VOC emissions, in tons, from all facility emissions units defined in B.2. calculated as below:

      The rolling, 12-month summation VOC emissions = [monthly VOC emissions from a) + sum of monthly VOC emissions from previous 11 calendar months] ÷ 2000.

8. The permittee shall submit quarterly deviation (excursion) reports of any exceedance of the VOC emission limitations outlined in B.6. If no exceedances occurred, the permittee shall state so in the report.

9. Emission Limitations:

   99.9 TPY for VOC, based on a rolling 12-month summation for the emissions units defined in B.2.

   Applicable Compliance Method:

   Compliance with the VOC emission limitations shall be demonstrated by the record keeping requirements specified in B.8.

10. The following insignificant emissions units are located at this facility:

EU ID	Operations, Property and/or Equipment Description
P515	Mill Set A, Building 10
P516	Mill Set B, Building 10I

   a) Each insignificant emissions unit at this facility must comply with all applicable Ohio EPA and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

11. The Ohio EPA has determined that this facility is subject to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, USEPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by USEPA. For more information on the area source rules, please refer to the following USEPA website:**http://www.epa.gov/ttn/atw/area/arearules.html**

    The area source rule(s) that apply are:

    a) 40 CFR Part 63 Subpart JJJJJJ: Industrial/Commercial/Institutional Boilers.

    b) 40 CFR Part 63 Subpart ZZZZ: Stationary Reciprocating Internal Combustion Engines; and

    c) 40 CFR 63 Subpart VVVVVV: Chemical Manufacturing Area Sources.

12. The following abbreviations are used throughout this permit.

    Nitrogen Oxides = NOx

    Carbon Monoxide =CO

    Organic Compounds = OC

    Volatile Organic Compounds = VOC

    Particulate emissions = PE

    Particulate emissions and Particulate matter less than 10 microns in diameter = PE/PM10

    Sulfur dioxide =SO2

    Hazardous Air Pollutant = HAP

    Tons per year = TPY

    MM = Million

    CFR = Code of Federal Regulations

    OAC = Ohio Administrative Code

C. Emissions Unit Terms and Conditions

1. B007, Boiler

Operations, Property and/or Equipment Description:

37.2 MMBtu/hr natural gas-fired boiler

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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) (PTI 14-01841 issued on 12/20/1989)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-17-10(B)(1).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 lb/MMBtu.

(1) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

Authority for Term: (OAC rule 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

Authority for Term: (OAC rule 3745-77-07(C)(1))

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

Authority for Term: (OAC rule 3745-77-07(C)(1))

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation(s):

Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as specified by rule

Applicable Compliance Method(s):

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

b. Emission Limitation(s):

0.020 lb PE /MMBtu

Applicable Compliance Method(s):

Compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr.) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs of filterable PE/MM cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBTU/hr.).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

Authority for Term: (OAC rules 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) None.

2. B009

Operations, Property and/or Equipment Description:

90 MMBtu/hr traveling grate coal-fired boiler controlled with a multiclone

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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(D) (PTI 14-05325 issued on 2/6/03)	HCl emissions shall not exceed 0.044 lb/MMBtu of actual heat input and 8.9 tons per year*. 42.1 TPY PM* 23.2 TPY PM10* 376.5 TPY SO2* 55.6 TPY NOx* 44.5 TPY CO* * based on a rolling, 12-month summation. See c)(3).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
c.	OAC rule 3745-17-10(C)(1)	PE shall not exceed 0.21 lb/MMBtu of actual heat input (based on a total heat input of 90 MMBtu/hr).
d.	OAC rule 3745-18-37(E)(2)	Sulfur dioxide emissions shall not exceed 1.88 lbs/MMBtu of actual heat input.
e.	40 CFR Part 64	See d)(6)-d)(9) and e)(3).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The coal burned in this emissions unit shall have a sulfur content that, when calculated in terms of pounds of sulfur dioxide per million Btu of heat content, complies with the allowable sulfur dioxide emission limitation contained in this permit.

Authority for Term: (OAC rule 3745-18-04(D) and (OAC rule 3745-77-07(A))

(2) During periods of low steam demand (equal to or less than 20,000 pounds of steam per hour), this emissions unit shall be taken out of operation.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) The maximum annual coal usage for emissions unit B009 shall not exceed 14,833 tons, based upon a rolling, 12-month summation of the coal usage figures.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

d) Monitoring and/or Recordkeeping Requirements

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

a. the HCl emission factor referenced in d)(2) below;

b. the total amount of coal burned;

c. the total HCl emissions, in pounds or tons per month [the summation of the emission factors found d)(1)a. multiplied by the fuel usage recorded in d)(1)b.;

d. the updated rolling, 12-month summation for HCl emissions, in pounds or tons [the summation of d)(1)c. for the current and previous 11-months of operation].

e. the updated rolling, 12-month summation for the amount of coal burned [the summation of d)(1)b. for the current and previous 11-months of operation].

f. the updated rolling, 12-month summations for PE, PM-10, NOx, and CO emissions, in pounds or tons.

Authority for term: (OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

(2) To determine the hydrochloric acid emissions from this emissions unit, the permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with the procedures specified ASTM method D2234, Standard Practice for Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample. The composite sample shall be prepared using the procedures specified in ASTM D2234-D2234M-03.

Each monthly composite sample of coal shall be analyzed for, chlorine concentration (lbs per million Btu) and heat content (Btu/pound of coal). ASTM D5865-04 shall be used to determine heat content, and SW-846-9250 or ASTM D6721-01 shall be used to determine the chlorine concentration. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

The permittee shall calculate the HCl emission rate in pounds per million Btu for the monthly composite sample referenced above. The HCl emission rate shall be calculated as specified below.

HCl = (Chlorine concentration * 1.028)

where

HCl = HCl emission rate in units of pounds per million Btu

Chlorine concentration = the chlorine concentration of the monthly composite sample in lbs per million BTU

1.028 = Molecular weight ratio of HCl to chlorine

Authority for term: (OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

(3) The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Standard Practice for Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, Standard Test Method for Ash in the Analysis Sample of Coal and Coke from Coal; ASTM method D3177, Standard Test Methods for Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Standard Test Methods for Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865 Standard Test Method for Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency

The permittee shall maintain monthly records of the total quantity of coal received, and the results of the analyses for ash content, sulfur content, and heat content.

Authority for term: (OAC rules 3745-18-04 and 3745-77-07(C)(1))

(4) The permittee shall calculate the average monthly SO2 emission rate.

SO2 emissions shall be calculated as follows:

$ER = (1 \times 10^{6}) / H \times S \times 1.9$

where:

ER = the emission rate in pounds of sulfur dioxide per MMBtu;

H = the heat content of the solid fuel in Btu per pound; and

S = the decimal fraction of sulfur in the solid fuel

The heat input (H) and the sulfur content (S) shall be based on the coal quality information collected and recorded in d(3).

Authority for term: (OAC rules 3745-18-04 and 3745-77-07(C)(1))

(5) The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Authority for term: (OAC rules 3745-77-07(C)(1), 3745-17-03(B)(1)(b) and 40 CFR Part 64)

(6) Each continuous emission monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

Authority for term: (OAC rules 3745-77-07(C)(1), 3745-17-03(B)(1)(b) and 40 CFR Part 64)

(7) The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that the requirements of Section 8 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

Authority for term: (OAC rules 3745-77-07(C)(1), 3745-17-03(B)(1)(b) and 40 CFR Part 64)

(8) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissions is the opacity of the visible emissions from the multiclone exhaust stack as measured and recorded by the certified continuous opacity monitoring (COM) system. The visible emissions indicator range is each six-minute block average with an opacity value greater than 15%. When the opacity value is greater than 15%, corrective action (including, but not limited to, an evaluation of the emissions unit and multiclone) will be required.

Upon detecting an excursion of the visible emission indicator range listed above, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

Authority for term: (OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05325: d)(1)-d)(8). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports for any exceedence of the emission limitations specified in b)(1)a. or the coal usage limitation specified in c)3.

Authority for term: (OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

(2) The permittee shall submit quarterly reports on the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

a. the total quantity of coal received (tons);

b. the average ash content (percent) of the coal received;

c. the average sulfur content (percent) of the coal received;

d. the average heat content (Btu/pound) of the coal received; and

e. the calculated, average sulfur dioxide emission rate (pounds sulfur dioxide/MMBtu actual heat input) for the coal received.

Compliance with the sulfur dioxide emission limit shall be determined each month by calculating the average monthly sulfur dioxide emission rate using the results of the analyses of the monthly composite sample for sulfur content and heat content.

Authority for term: (OAC rules 3745-18-04 and 3745-77-07(C)(1))

(3) The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunction. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

Authority for term: (OAC rules 3745-77-07(C)(1), 3745-17-07(A)(3) and 40 CFR Part 64)

(4) The permittee shall submit deviation (excursion) reports for any time period when the emissions unit was operated when steam demand was below the value specified in c)(2).

Authority for term: (OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to

Install 14-05325: e)(1)-e)(3), The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

HCl emissions shall not exceed 0.044 lb/MMBtu of actual heat input and 8.9 tons per year, based on a rolling 12-month summation.

Applicable Compliance Method

Compliance may be demonstrated by the information collected and recorded in d)(1) and d)(2).

Authority for term: (OAC rules 3745-31-05(D) and 3745-77-07(C)(1))

b. Emission Limitation:

0.21 lb of PE per MMBtu of actual heat input 42.1 TPY PE based on a rolling 12-month summation.

Applicable compliance method:

The permittee currently does not operate emission unit B009. Should the permittee recommence with the operation of emission unit B009, the permittee shall conduct, or have conducted, emission testing for this emissions unit within 90 days after restart-up in accordance with the following requirements.

Should the permittee recommence with the operation of emission unit B009 and a stack test be conducted, future stack test may be required on a frequency established by Ohio EPA Engineering Guide 16.

The emission testing shall be conducted to demonstrate compliance with the allowable PE emission rate of 0.21 lb/MMBtu of actual heat input.

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60 Appendix A, Methods 1-5.

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

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

Compliance with the lbs. of PE/MMBtu emission limitation and the coal usage limitation specified in c)(3) ensures compliance with the TPY emission limitation.

Authority for term: (OAC rules 3745-17-10(B) and 3745-77-07(C)(1))

c. Emission Limitation:

Sulfur Dioxide (SO2) emissions shall not exceed 1.88 lbs. of SO2/MMBtu of actual heat input and 376.5 TPY based on a rolling 12-month summation.

Applicable compliance method:

Compliance with the lbs. of SO2/MMBtu may be demonstrated by the coal quality information collected in d)(3) and the emission calculations performed in d)(4).

Compliance with the lbs. of SO2/MMBtu emission limitation and the coal usage limitation specified in c)(3) ensures compliance with the TPY emission limitation.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the procedures specified in OAC rule 3745-18-04(D)(7).

Authority for term: (OAC rules rule 3745-18-04 and 3745-77-07(C)(1))

d. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through the continuous opacity monitoring required d)(5)-d)(7).

If required, visible emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

e. Emission Limitation:

55.6 TPY of NOx and 44.5 of TPY CO based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with coal usage limitation specified in c)(3) ensures compliance with the TPY of NOx and CO emission limitations.

Authority for term: (OAC rules 3745-17-03(B)(1) and 3745-77-07(C)(1))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05325: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

3. B010, Boiler

Operations, Property and/or Equipment Description:

119.4 MMBtu/hr natural gas/No.2 fuel oil-fired boiler

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 3745-17-07(A)	Visible particulate emissions (PE) from this emissions unit shall not exceed 20% opacity as a 6-minute average, except as specified by rule.
b.	OAC rule 3745-17-10(B)(1) .	Particulate emissions (PE) shall not exceed 0.020 lb/MMBtu.
c.	OAC rule 3745-18-37(E)(3)	Sulfur dioxide emissions shall not exceed 1.2 lbs/MMBtu of actual heat input.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit.

Authority for Term: (OAC rules 3745-77-07(A)(1))

(2) The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in this permit.

Authority for Term: (OAC rules 3745-77-07(A)(1) and 3745-18-37(E))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/MMBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)]. A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/MMBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)].

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

Authority for Term: (OAC rules 3745-77-07(C)(1), 3745-18-04(E)(3), and 3745-18-04(I))

(2) For each day during which the permittee burns a fuel other than natural gas or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

Authority for Term: (OAC rules 3745-77-07(A)(1))

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate local air agency or District Office) in writing of any fuel burned in this emissions unit other than natural gas or No. 2 fuel oil.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-18-37)

(2) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from d)(1) above. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the deviation occurs.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-18-37))

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation(s):

Visible particulate emissions (PE) shall not exceed 20% opacity, as a 6-minute average, except as specified by rule

Applicable Compliance Method(s):

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

b. Emission Limitation(s):

0.020 lb of PE /MMBtu.

Applicable Compliance Method(s):

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr.) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs of filterable PE/MM cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBTU/hr.).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 while firing only natural gas.

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr.) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 2 lbs of filterable PE/1000 gallons and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBTU/hr.).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 while firing No.2 fuel oil.

c. Emission Limitation(s):

1.2 lbs of SO2/MMBtu.

Applicable Compliance Method(s):

Continuous compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received, or each daily composite sample of the oil burned during each calendar day, meets the limitation.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-18-04(E))

g) Miscellaneous Requirements

(1) None.

4. P154

Operations, Property and/or Equipment Description:

Wastewater Pretreatment

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) e)(4).

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 14-02096, modification issued 8/3/2004)	3.1 lbs. of organic compounds (OC) per hour, and 13.6 tons of OC per year. The hourly and TPY emission limitations are based on the emissions unit's potential to emit. Therefore, no additional monitoring, record keeping, or reporting requirements are necessary to demonstrate compliance with this emission limitation.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The covers over the wastewater pretreatment cells shall be maintained under negative pressure and vented to the carbon adsorption system.

Authority for Term: (OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3))

(2) The carbon adsorption system shall be installed, operated, and maintained in accordance with the manufacturer's recommendations for the control of odors from this emissions unit.

Authority for Term: (OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3))

(3) The average OC concentration in the exhaust gases from the carbon adsorber, for any 3-hourblock of time, shall not exceed 20 ppm.

Authority for Term: (OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

(1) On a monthly basis, the permittee shall monitor a representative natural draft opening from each of the six wastewater pretreatment cells using an organic vapor analyzer (OVA). The maximum value detected for each cell shall be recorded. The instrument shall be operated, calibrated, and maintained in accordance with the manufacturer's recommendations. A "leak" shall be defined as an instrument reading of 500 ppmv or greater above background. In the event that a "leak" is detected, the permittee shall take corrective action, with a first attempt at repair within five days of detecting the leak, and repair completed and verified with the OVA within fourteen days. In the event that the repair cannot be completed within fourteen days, the permittee may apply for written approval for a "delay of repair" from the Hamilton County Department of Environmental Services.

The permittee shall maintain records of the results of any leak checks, including, at a minimum, the following information:

a. date of inspection;

b. findings (may indicate no leaks discovered or location, nature, and severity of each leak);

c. corrective action (date each leak repaired and reasons for any repair interval in excess of 5 or 14 calendar days); and

d. inspector's name and signature.

Authority for Term: (OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3))

(2) The permittee shall operate and maintain a continuous organic monitoring device and recorder which measures and records the OC concentration in the exhaust gases from the carbon adsorber when the emissions unit is in operation. The organic monitoring device and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation; and

b. all 3-hour blocks of time (when the emissions unit was in operation) during which the average OC concentration in the exhaust gases was more than 20 ppm.

Authority for Term: (OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-02096: d)(1)-d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly reports which identify the following based upon the monitoring in d)(1):

a. the date any leak was detected;

b. the date of first repair; and

c. the date of final repair.

The reports shall be submitted to the Hamilton County Department of Environmental Services by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively) .

If no leaks occurred, the permittee shall state so in the report.

Authority for Term: (OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3))

(2) Any leaks that an attempt to repair is not made within five days of discovery, or is not repaired within fourteen days shall be reported to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the date the repair was to be completed.

Authority for Term: (OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3))

(3) The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average OC concentration of the exhaust gases from the carbon adsorber exceeded the concentration limitation specified in c)(3).

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively) .

If no exceedances occurred, the permittee shall state so in the report.

Authority for Term: (OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3))

(4) Modeling to demonstrate compliance with, the Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit s maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified PTIprior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTI.

Authority for Term: (ORC 3704.03(F)(3)(c) and F(4))

(5) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-02096 e)(1)-e)(4), The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation(s):

3.1 lbs. of organic compounds (OC) per hour.

Compliance with the specified emission rate was demonstrated by the performance test conducted May 4, 2004, which measured an actual emission rate of 0.6 lb. of OC per hour.

Authority for Term: (OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-02096: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -Ball Mills A, B, D, and G:

EU ID	Operations, Property and/or Equipment Description
P476	Ball Mill 104, Building 21
P477	Ball Mill 103, Building 21
P479	Ball Mill 105, Building 21
P482	Ball Mill 106, Building 21

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) d)(5).

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 14-05390 issued 6/17/2003)	Particulate emissions and Particulate matter less than 10 microns in diameter (PE-PM10) shall not exceed 0.01 pound (lb)/hour* (hr) and 0.05 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 1.73 lbs/hr* and 7.56 TPY. *The hourly emission limitations are based on the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D).

b.	OAC rule 3745-31-05 (D) (PTI 14-05390 issued 6/17/2003)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE 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) The permittee shall collect and record the following information each month:

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the baghouse has been established to be not less than 0.5 inches of water.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) 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 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 a minor permit modification.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit

to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall submit quarterly deviation (excursion) reports which identify the following:

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 e)(2)a. where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)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 e)(2)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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05390 e)(1)-e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

1.73 lbs. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

7.56 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493,

P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.01 lb./hr of PE/PM-10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing multiplied by the fabric filter control efficiency 95%.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.05 TPY of PE/PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1). multiplied by the fabric filter control efficiency 95%.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

6. P478, Ball Mill C

Operations, Property and/or Equipment Description:

Ball Mill 107, Building 21

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(5).

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 14-05390 issued 6/17/2003)	Particulate emissions and Particulate matter less than 10 microns in diameter (PE-PM10) shall not exceed 0.01 pound (lb)/hour* (hr) and 0.05 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 0.47 lb./hr* and 2.08 TPY. *The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D).
b.	OAC rule 3745-31-05 (D) (PTI 14-05390 issued 6/17/2003)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE 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) The permittee shall collect and record the following information each month:

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the baghouse has been established to be not less than 0.5 inches of water.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) 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 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 a minor permit modification.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the

"Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall submit quarterly deviation (excursion) reports which identify the following:

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 e)(2)a. where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)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 e)(2)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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05390 e)(1)-e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

0.47 lb. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

2.08 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493,

P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.01 lb./hr of PE/PM-10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing multiplied by the fabric filter control efficiency 95%.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.05 TPY of PE/PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1). multiplied by the fabric filter control efficiency 95%.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

7. P480, Ball Mill E

Operations, Property and/or Equipment Description:

Ball Mill 108, Building 21

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(5).

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 14-05390 issued 6/17/2003)	Particulate emissions and Particulate matter less than 10 microns in diameter (PE-PM10) shall not exceed 0.01 pound (lb)/hour* (hr) and 0.05 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 0.65 lb/hr* and 2.83 TPY. *The hourly emission limitations are based on the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D).
b.	OAC rule 3745-31-05 (D) (PTI 14-05390 issued 6/17/2003)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE 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) The permittee shall collect and record the following information each month:

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the baghouse has been established to be not less than 0.5 inches of water.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) 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 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 a minor permit modification.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the

"Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall submit quarterly deviation (excursion) reports which identify the following:

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 e)(2)a. where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)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 e)(2)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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05390 e)(1)-e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

0.65 lb. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

2.83 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493,

P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.01 lb./hr of PE-PM10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing multiplied by the fabric filter control efficiency 95%.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.05 TPY of PE-PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1). multiplied by the fabric filter control efficiency 95%.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

8. P481, Ball Mill F

Operations, Property and/or Equipment Description:

Ball Mill 101, Building 21

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(5).

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 14-05390 issued 6/17/2003)	Particulate emissions and Particulate matter less than 10 microns in diameter (PE-PM10) shall not exceed 0.01 pound (lb)/hour* (hr) and 0.05 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 3.45 lbs/hr* and 15.11 TPY. *The hourly emission limitations are based on the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D).
b.	OAC rule 3745-31-05 (D) (PTI 14-05390 issued 6/17/2003)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE 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) The permittee shall collect and record the following information each month:

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the baghouse has been established to be not less than 0.5 inches of water.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) 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 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 a minor permit modification.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the

"Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall submit quarterly deviation (excursion) reports which identify the following:

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 e)(2)a. where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)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 e)(2)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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05390 e)(1)-e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

3.45 lbs. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

15.11 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493,

P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.01 lb./hr of PE-PM-10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing multiplied by the fabric filter control efficiency 95%.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.05 TPY of PE-PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1). Multiplied by the fabric filter control efficiency 95%.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

9. P483, Ball Mill L

Operations, Property and/or Equipment Description:

Ball Mill 102, Building 21

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(5).

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 14-05390 issued 6/17/2003)	Particulate emissions and Particulate matter less than 10 microns in diameter (PE-PM10) shall not exceed 0.01 pound (lb)/hour* (hr) and 0.05 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 1.21 lbs/hr* and 5.29 TPY. *The hourly emission limitations are based on the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D).
b.	OAC rule 3745-31-05 (D) (PTI 14-05390 issued 6/17/2003)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE 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) The permittee shall collect and record the following information each month:

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the baghouse has been established to be not less than 0.5 inches of water.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) 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 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 a minor permit modification.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the

"Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall submit quarterly deviation (excursion) reports which identify the following:

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 e)(2)a. where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)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 e)(2)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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05390 e)(1)-e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

1.21 lbs. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

5.29 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493,

P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.01 lb./hr of PE-PM-10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing multiplied by the fabric filter control efficiency 95%.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.05 TPY of PE-PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1). Multiplied by the fabric filter control efficiency 95%.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

10. P495, Drais Mill 1 DR

Operations, Property and/or Equipment Description:

101S, Building 12

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(3).

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) (14-05390 issued 6/17/2003)	Particulate emissions and Particulate matter less than 10 microns in diameter (PE-PM10) shall not exceed 0.03 pound (lb)/hour* (hr) and 0.15 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 1.17 lbs/hr* and 5.14 TPY. *The hourly emission limitations are based on the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).
b.	OAC rule 3745-31-05 (D) (14-05390)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-08(B)	The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.

d.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a three - minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, 504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE from this emissions unit shall be vented to a building enclosure at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05390: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

1.17 lbs. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

5.14 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480,

P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.03 lb./hr of PE-PM-10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.15 TPY of PE-PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1)

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced

Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

11. P496, Drais Mill 2 DR

Operations, Property and/or Equipment Description:

101S, Building 10

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(3)

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 14-05390 issued 6/17/2003)	Particulate emissions and Particulate matter less than 10 microns in diameter (PE-PM10) shall not exceed 0.07 pound (lb)/hour* (hr) and 0.30 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 2.35 lbs/hr* and 10.28 TPY. *The hourly emission limitations are based on the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).
b.	OAC rule 3745-31-05 (D) (PTI 14-05390 issued 6/17/2003)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-08(B)	The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.

d.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a three - minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE from this emissions unit shall be vented to a building enclosure at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05390: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

2.35 lbs. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

10.28 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480,

P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.07 lb./hr of PE-PM-10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.30 TPY of PE-PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1)

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced

Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

12. P497, Drais Mill 3 DR

Operations, Property and/or Equipment Description:

102S, Building 12

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(3).

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 14-05390 issued 6/17/2003)	Particulate emissions and Particulate matter less than 10 microns in diameter (PE-PM10) shall not exceed 0.10 pound (lb)/hour* (hr) and 0.45 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 3.52 lbs/hr* and 15.42 TPY. *The hourly emission limitations are based on the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).
b.	OAC rule 3745-31-05 (D) (PTI 14-05390 issued 6/17/2003)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-08(B)	The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.

d.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a three - minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE from this emissions unit shall be vented to a building enclosure at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05390: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

3.52 lbs. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

15.42 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480,

P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.10 lb./hr of PE-PM-10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.45 TPY of PE-PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced

Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

13. P498, Drais Mill 4 DR

Operations, Property and/or Equipment Description:

110S, Building 12

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(3).

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 14-05390 issued 6/17/2003)	Particulate emissions and Particulate matter less than 10 microns in diameter (PE-PM10) shall not exceed 0.14 pound (lb)/hour* (hr) and 0.60 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 4.70 lbs/hr* and 20.56 TPY. *The hourly emission limitations are based on the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).
b.	OAC rule 3745-31-05 (D) (PTI 14-05390 issued 6/17/2003)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-08(B)	The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.

d.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a three - minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE from this emissions unit shall be vented to a building enclosure at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05390: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

4.70 lbs. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

20.56 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480,

P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.14 lb./hr of PE-PM-10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.60 TPY of PE-PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced

Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

14. P499, Pony Mixer 1

Operations, Property and/or Equipment Description:

111M, Building 21

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(5).

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 14-05390 issued 6/17/2003)	Particulate emissions and Particulate matter less than 10 microns in diameter (PE-PM10) shall not exceed 0.01 pound (lb)/hour* (hr) and 0.05 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 4.40 lbs/hr* and 19.27 TPY. *The hourly emission limitations are based on the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D).
b.	OAC rule 3745-31-05 (D) (PTI 14-05390 issued 6/17/2003)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE 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) The permittee shall collect and record the following information each month:

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the baghouse has been established to be not less than 0.5 inches of water.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) 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 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 a minor permit modification.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the

"Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall submit quarterly deviation (excursion) reports which identify the following:

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 e)(2)a. where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)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 e)(2)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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05390 e)(1)-e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

4.40 lbs. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

19.27 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493,

P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.01 lb./hr of PE-PM-10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing multiplied by the fabric filter control efficiency 95%.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.05 TPY of PE-PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1). Multiplied by the fabric filter control efficiency 95%.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

15. P500, Double Post Mixer

Operations, Property and/or Equipment Description:

Dispersion Mixer 107, Building 12

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(3).

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 14-05390 issued 6/17/2003)	Particulate emissions and Particulate matter less than 10 microns in diameter (PE-PM10) shall not exceed 0.05 pound (lb)/hour* (hr) and 0.23 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 4.40 lbs/hr* and 19.27 TPY. *The hourly emission limitations are based on the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).
b.	OAC rule 3745-31-05 (D) (PTI 14-05390 issued 6/17/2003)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-08(B)	The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.

d.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a three - minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE from this emissions unit shall be vented to a building enclosure at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05390: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

4.40 lbs. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

19.27 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480,

P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.05 lb./hr of PE-PM-10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.23 TPY of PE-PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced

Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

16. P501, Pony Mixer 3

Operations, Property and/or Equipment Description:

111M, Building 12

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(3).

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 14-05390 issued 6/17/2003)	Particulate emissions and Particulate matter less than 10 microns in diameter (PE-PM10) shall not exceed 0.03 pound (lb)/hour* (hr) and 0.12 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 4.40 lbs/hr* and 19.27 TPY. *The hourly emission limitations are based on the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).
b.	OAC rule 3745-31-05 (D) (PTI 14-05390 issued 6/17/2003)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-08(B)	The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.

d.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a three - minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE from this emissions unit shall be vented to a building enclosure at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05390: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

4.40 lbs. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

19.27 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480,

P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.05 lb./hr of PE-PM-10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.12 TPY of PE-PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced

Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

17. P506, Roll Mill 5

Operations, Property and/or Equipment Description:

Roll Mill 5, Building 12, ID 42

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(3).

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 14-05390 issued 6/17/2003)	Particulate emissions and Particulate matter less than 10 microns in diameter (PE-PM10) shall not exceed 0.05 pound (lb)/hour* (hr) and 0.23 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 4.40 lbs/hr* and 19.27 TPY. *The hourly emission limitations are based on the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).
b.	OAC rule 3745-31-05 (D) (PTI 14-05390 issued 6/17/2003)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-08(B)	The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.

d.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a three - minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE from this emissions unit shall be vented to a building enclosure at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05390: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

4.40 lbs. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

19.27 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480,

P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.05 lb./hr of PE-PM-10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.23 TPY of PE-PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced

Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

18. P507, Roll Mill 6

Operations, Property and/or Equipment Description:

Roll Mill 6, Building 21, ID 109

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(3).

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 14-05390 issued 6/17/2003)	Particulate matter - particulate matter less than 10 microns (PM-PM10) emissions shall not exceed 0.05 pound (lb)/hour* (hr) and 0.23 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 4.40 lbs/hr* and 19.27 TPY. *The hourly emissions limitation is based on the maximum capacity of the equipment and thus, no hourly record keeping is required. See b)(1)a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).
b.	OAC rule 3745-31-05 (D) (PTI 14-05390 issued 6/17/2003)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-08(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).

d.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a three - minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE from this emissions unit shall be vented to a building enclosure at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05390: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

4.40 lbs. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

19.27 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480,

P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.05 lb./hr of PE-PM-10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.23 TPY of PE-PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced

Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

19. P512, Oil-based carbon dispersion process

Operations, Property and/or Equipment Description:

Oil-based carbon dispersion process

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1)

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), as effective 11/30/01 (Permit Number P0108507 issued on 9/19/2011)	Emissions of Volatile Organic Compounds (VOC) shall not exceed 26.7 lbs/hour. Particulate emissions and emissions of particulate matter 10 microns and less in diameter (PE/PM10)* shall not exceed 0.20 pound per hour and 0.86 ton per year. *Assume all emissions of particulate matter 2.5 microns and less in diameter PM2.5 are a subset of PM10 emissions. See b)(2)a., b)(2)b., and b)(2)f. The requirements for this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-17-07(A)(1), OAC rule 3745-17-07(B)(1), OAC rule 3745-17-08(B)(3), and OAC rule 3745-17-11(B).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Major NSR permitting) (Permit Number P0108507 issued on 9/19/2011)	Emissions of Volatile Organic Compounds (VOC) shall not exceed 31.75 tons per year based on a rolling, 12-month summation. See b)(2)c.

c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)g.
d.	OAC rule 3745-17-07(A)(1)	The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
e.	OAC rule 3745-17-07(B)(1)	The visible particulate emissions from any fugitive dust source shall not exceed 20 percent opacity, as a three-minute average.
f.	OAC rule 3745-17-08(B)(3)	See b)(2)d. and b)(2)e.
g.	OAC rule 3745-17-11(B)	a) Particulate emissions shall not exceed 4.73 lbs/hour.

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A) (3) (BAT) shall be demonstrated use of covers for control of volatile organic compound emissions, and VOC input limitations.

b. The 26.70 pounds of VOC per hour emissions limitations was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with these limitations.

c. The total VOC input for emissions unit P512 (Oil-Based Carbon Dispersion Train) shall not exceed 2117 tons per year based upon a rolling, 12-month summation of the VOC input.

d. The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.

e. The fugitive dust from this emissions unit shall be controlled by the use of reasonably available control measures adequate to minimize or eliminate visible particulate emissions.

f. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy

BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

g. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE/PM10* emissions from this air contaminant source since the uncontrolled potential to emit for PE/PM10 is less than 10 tons/yr each.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. The identification number of each batch made (product code).

b. The batch size in pounds.

c. The total pigment content of each batch; in pounds.

d. The liquid volatile organic compound input for each batch, in pounds.

e. The liquid organic cleanup material employed, in pounds.

f. The total monthly emissions, in pounds as calculated below:

Monthly VOC emissions = Sum of [(d) x 0.015 lb of VOC emission/lb VOC input] for all batches made per month.

g. The rolling, 12-month summation of VOC emissions, in tons, from this emissions unit as calculated below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (f) + sum of monthly VOC emissions from previous 11 calendar months)/2000).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions unit P512, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions unit P512, as calculated as below:

Rolling, 12-month summation of the VOC input, = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) 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 daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted and the appropriate range is established to demonstrate compliance.

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 a minor permit modification.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0108507): d)(1)-d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the baghouse during the operation of the 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 range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;

b. an identification of each incident of deviation described in a (above) where a prompt investigation was not conducted;

c. an identification of 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

d. an identification of 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 report shall so state that no deviations occurred during the reporting period.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of both the rolling, 12 month VOC input and emission limitations.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0108507 e)(1)-e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

b. Emission limitation:

Emissions of Volatile Organic Compounds (VOC) shall not exceed 26.7 lbs/hour.

Applicable Compliance Method:

Compliance with the VOC emission limitations in term b)(1) shall be determined by emission factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

c. Emission limitation:

Emissions of Volatile Organic Compounds (VOC) shall not exceed 31.75 tons per year based on a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be determined based on recordkeeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

d. Emission Limitation:

Particulate emissions and emissions of particulate matter 10 microns and less in diameter (PE/PM10) shall not exceed 0.20 pound per hour and 0.86 ton per year.

Particulate emissions shall not exceed 4.73 pounds per hour.

PE/PM10 shall not exceed 10 tons per year.

Applicable Compliance Method:

Compliance with the particulate emission limitations in b)(1) shall be determined by emission factors from AP-42 6.7-1 (5/83), Emission Factors for Printing Ink Manufacturing, and a dust collector capture efficiency of 90 percent and control efficiency of 99 percent.

If required, the permittee shall demonstrate compliance with the lb/hour emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5.

Compliance with the 0.86 ton per year of PE limitation shall be determined based on recordkeeping in d)(1) by summing all the monthly records.

Compliance with the PM10 limitation is assumed with compliance with the PE limitations.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

e. Emission Limitation

The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

f. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

g. Emission Limitation:

Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0108507: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with the Ohio EPA s Air Toxic Policy was not necessary because the emissions unit s maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a modification as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

20. P513, Water-based carbon dispersion train

Operations, Property and/or Equipment Description:

Water-based carbon dispersion train

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(4)-d)(7)

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), as effective 11/30/01 (Permit Number P0108507 issued on 9/19/2011)	Emissions of Volatile Organic Compounds (VOC) shall not exceed 4.71 lbs/hour. Particulate emissions and emissions of particulate matter 10 microns and less in diameter (PE/PM10)* shall not exceed 0.10 pound per hour and 0.46 ton per year. *Assume all emissions of particulate matter 2.5 microns and less in diameter PM2.5 are a subset of PM10 emissions. See b)(2)a., b)(2)b., and b)(2)f. The requirements for this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-17-07 (A)(1), OAC rule 3745-17-07 (B)(1), OAC rule 3745-17-08 (B)(3), and OAC rule 3745-17-11(B).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Major NSR permitting) (Permit Number P0108507 issued on 9/19/2011)	Emissions of Volatile Organic Compounds (VOC) shall not exceed 8.13 tons per year based on a rolling, 12-month summation. See b)(2)c.

c.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)g.
d.	OAC rule 3745-17-07 (A)(1)	The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
e.	OAC rule 3745-17-07 (B)(1)	The visible particulate emissions from any fugitive dust source shall not exceed 20 percent opacity, as a three-minute average.
f.	OAC rule 3745-17-08 (B)(3)	See b)(2)d. and b)(2)e.
g.	OAC rule 3745-17-11 (B)	Particulate emissions shall not exceed 2.84 lbs/hour.

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated use of covers for control of volatile organic compound emissions, and VOC input limitations.

b. The 4.71 pounds of VOC per hour emission limitations was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with these limitations.

c. The total VOC input for emissions unit P513 (Water-Based Carbon Dispersion Train) shall not exceed 542 tons per year based upon a rolling, 12-month summation of the VOC input.

d. The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.

e. The fugitive dust from this emissions unit shall be controlled by the use of reasonably available control measures adequate to minimize or eliminate visible particulate emissions.

f. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA

approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

g. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE/PM10* emissions from this air contaminant source since the uncontrolled potential to emit for PE/PM10 is less than 10 tons/yr each.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. The identification number of each batch made (product code).

b. The batch size in pounds.

c. The total pigment content of each batch; in pounds.

d. The liquid volatile organic compound input for each batch, in pounds.

e. The liquid organic cleanup material employed, in pounds.

f. The total monthly emissions, in pounds as calculated below:

Monthly VOC emissions = Sum of [(d) x 0.015 lb of VOC emission/lb of VOC input] for all batches made per month.

g. The rolling, 12-month summation of VOC emissions, in tons, from this emissions unit as calculated below:

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from (f) + sum of monthly VOC emissions from previous 11 calendar months)/2000).

Authority for Term: (OAC rules 3745-77-07(A)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. The total monthly VOC input for emissions unit P513, in tons.

b. The rolling, 12-month summation of the VOC input, in tons, from emissions unit P513, as calculated as below:

Rolling, 12-month summation of the VOC input, = (monthly VOC input from (a) + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(A)(1) and 3745-31-05(D))

(3) 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 daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required emission testing is conducted and the appropriate range is established to demonstrate compliance.

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 a minor permit modification

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) The permit to install for this emissions unit (P513) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit application. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

   i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; or

   ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLVNone.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., 24 hours per day and 7 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Toxic Contaminant: ethylene glycol

TLV (mg/m3): 100,000

Maximum Hourly Emission Rate (lbs/hr): 4.71

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 367.3

MAGLC (ug/m3): 2381

The permittee, has demonstrated that emissions of ethylene glycol, from emissions unit(s) P513, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a modification or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):

a. description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0108507): d)(1)-d)(7). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the baghouse during the operation of the 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 range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;

b. an identification of each incident of deviation described in a (above) where a prompt investigation was not conducted;

c. an identification of 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

d. an identification of 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 report shall so state that no deviations occurred during the reporting period.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of both the rolling, 12 month VOC input and emission limitations and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

Authority for Term: (OAC rules 3745-77-07(A)(1) and 3745-31-05)

(3) The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0108507): d)(1)-d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

b. Emission Limitation:

Emissions of Volatile Organic Compounds (VOC) shall not exceed 4.71 lbs/hour.

Applicable Compliance Method:

Compliance with the VOC emission limitations in b)(1) shall be determined by emissions factors from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

c. Emission limitation:

Emissions of Volatile Organic Compounds (VOC) shall not exceed 8.13 tons per year based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on recordkeeping in d).

Authority for Term: (OAC rules 3745-77-07(A)(1) and 3745-31-05)

d. Emission Limitation:

Particulate emissions and emissions of particulate matter 10 microns and less in diameter (PE/PM10)* shall not exceed 0.10 pound per hour and 0.46 ton per year.

Particulate emissions shall not exceed 2.84 pounds per hour.

PE/PM10* shall not exceed 10 tons per year.

Applicable Compliance Method:

Compliance with the particulate emission limitations in b)(1) shall be determined by emission factors from AP-42 6.7-1 (5/83), Emission Factors for Printing Ink Manufacturing, and a dust collector capture efficiency of 90 percent and control efficiency of 99 percent.

If required, the permittee shall demonstrate compliance with the lb/hour emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5.

Compliance with the 0.46 ton per year or the 10 ton per year of PE limitations shall be determined based on recordkeeping in d)(1) by summing all the monthly records.

Compliance with the PM10 limitation is assumed with compliance with the PE limitations

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

e. Emission Limitation

The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent

Applicable compliance method:

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

f. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

g. Emission Limitation:

Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0108507: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

21. P514, Pigment and Dispersion Process

Operations, Property and/or Equipment Description:

Mulch colorant dispersion media

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1).

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), as effective 11/30/01 (Permit to Install P0107332 issued 2/9/2011)	Emissions of volatile organic compounds (VOC) shall not exceed 1.69 pounds per hour and 7.42 tons per year (TPY). Particulate emissions and emissions of particulate matter 10 microns and less in diameter (PE/PM10) shall not exceed 0.007 pound per hour and 0.03 ton per year. See b)(2)a., b)(2)b., and b)(2)e.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06 (Permit to Install P0107332 issued 2/9/2011)	See b)(2)f.
c.	OAC rule 3745-17-07(A)(1)	The visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-07(B)(1)	The visible particulate emissions from any fugitive dust source shall not exceed 20 percent opacity, as a three-minute average.
e.	OAC rule 3745-17-08(B)(3)	See b)(2)c. and b)(2)d.
f.	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.647 lb/hour.

(2) Additional Terms and Conditions

a. The permittee shall employ a dust collector during dry materials addition activities.

b. The short-term hourly VOC and PE/PM10 emissions are based on the emissions unit's Potential to Emit (PTE). Therefore, no per batch or hourly records are required to demonstrate compliance with these limitations.

c. The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.

d. The fugitive dust from this emissions unit shall be controlled by the use of reasonably available control measures adequate to minimize or eliminate visible particulate emissions.

e. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

f. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC and PE/PM10 emissions from this air contaminant source since the uncontrolled potential to emit for VOC and PE/PM10 is less than 10 tons/yr each.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. The identification number of each batch made (product code).

b. The batch size in pounds.

c. The total pigment content of each batch; in pounds.

d. The liquid volatile organic compound input for each batch, in pounds.

e. The liquid organic cleanup material employed, in pounds.

f. The total monthly emissions, in pounds as calculated below:

Monthly VOC emissions = Sum of [(d.) x 0.015 lb of VOC emissions/lb of VOC input] for all batches made per month.

Authority for Term: (OAC rules 3745-77-07(A)(1) and 3745-31-05(A)(3))

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving the emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. the total duration of any visible emissions incident; and

c. any corrective actions taken to eliminate the visible emissions.

The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install P0107332: d)(1)-d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall identify the following information in the Title V Compliance Certification in accordance with the monitoring requirements for visible emissions in d)(2) above:

a. all days during which any visible particulate emissions were observed from the stack(s) serving the emissions unit; and any corrective actions taken to eliminate the visible particulate emissions.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install P0107332: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

b. Emission Limitations:

Particulate emissions and emissions of particulate matter 10 microns and less in diameter (PE/PM10) shall not exceed 0.007 pound per hour and 0.03 ton per year.

Particulate emissions shall not exceed 0.647 lb/hour.

Applicable Compliance Method:

Compliance with the particulate emission limitations in b)(1) shall be determined by emission factors from AP-42 Table 6.7-1 (5/83), Emission Factors for Printing Ink Manufacturing, and a dust collector capture efficiency of 90 percent and control efficiency of 99 percent.

If required, the permittee shall demonstrate compliance with the lb/hour emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5.

Compliance with the 0.03 ton per year of PE limitation shall be determined based on recordkeeping in d)(1) by summing all the monthly records.

Compliance with the PM10 limitation is assumed with compliance with the PE limitations. It is also assumed that the particulate matter emissions of 2.5 microns and less are less than the amounts of PM10 emissions.

c. Emission Limitation:

The particulate emission rate at the control device outlet shall not exceed 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gas or no visible particulate emissions from the exhaust stack, whichever is less stringent.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by emission testing in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

Compliance may be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

d. Emission limitation:

Emissions of Volatile Organic Compounds (VOC) shall not exceed 1.69 lbs/hour.

Applicable Compliance Method:

Compliance with the VOC emission limitations in term b)(1) shall be determined by emission factors from AP-42, 6.4-1 (5/83), uncontrolled emission factors for paint and varnish manufacturing.

e. Emission limitation:

Emissions of Volatile Organic Compounds (VOC) shall not exceed 7.42 tons per year.

Applicable Compliance Method:

Compliance shall be determined based on recordkeeping in d)(1) by summing all the monthly records.

f. Emission Limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

g. Emission Limitation:

Fugitive visible particulate emissions shall not exceed 20 percent opacity, as a three-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install P0107332: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) Modeling to demonstrate compliance with the Ohio EPA s Air Toxic Policy was not necessary because the emissions unit s maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a modification as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

22. Emissions Unit Group -High Speed Dispersoers 1 - 4: P484,P485,P486,P487,

EU ID	Operations, Property and/or Equipment Description
P484	Dispersion Tank 112, Building 21
P485	Dispersion Tank 113, Building 21
P486	Dispersion Tank 114, Building 21
P487	Dispersion Tank 115, Building 21

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) d)(5).

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 14-05390 issued 6/17/2003)	Particulate emissions and Particulate matter less than 10 microns in diameter (PE-PM10) shall not exceed 0.03 pound (lb)/hour* (hr) and 0.15 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 4.70 lbs/hr* and 20.56 TPY. *The hourly emission limitations are based on the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(D).

b.	OAC rule 3745-31-05 (D) (PTI 14-05390 issued 6/17/2003)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six- minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE 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) The permittee shall collect and record the following information each month:

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the baghouse has been established to be not less than 0.5 inches of water.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) 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 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 a minor permit modification.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(6) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(5). The monitoring and record keeping requirements contained in the above-referenced Permit

to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall submit quarterly deviation (excursion) reports which identify the following:

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 e)(2)a. where a prompt investigation was not conducted;

d. each incident of deviation described in e)(2)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 e)(2)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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-05390 e)(1)-e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

4.70 lbs. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

20.56 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493,

P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.03 lb./hr of PE-PM-10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing multiplied by the fabric filter control efficiency 95%.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.15 TPY of PE-PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1). Multiplied by the fabric filter control efficiency 95%.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

23. Emissions Unit Group -High speed dispersers 5 - 11: P488,P489,P490,P491,P492,P493,P494,

EU ID	Operations, Property and/or Equipment Description
P488	Dispersion Tank 103, Building 12
P489	Dispersion Tank 104, Building 12
P490	Dispersion Tank 105, Building 12
P491	Dispersion Tank 106, Building 12
P492	Dispersion Tank 108, Building 12
P493	High Speed Disperser 10, Building 10, ID 102
P494	High Speed Disperser 11, Building 12, ID 139

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) d)(3).

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 14-05390 issued 6/17/2003)	Particulate emissions and Particulate matter less than 10 microns in diameter (PE-PM10) shall not exceed 0.14 pound (lb)/hour* (hr) and 0.60 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 4.70 lbs/hr* and 20.56 TPY. *The hourly emission limitations are based on the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05 (D) (PTI 14-05390 issued 6/17/2003)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-08(B)	The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.
d.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a three - minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE from this emissions unit shall be vented to a building enclosure at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to

Install 14-05390: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

4.70 lbs. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

20.56 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.14 lb./hr of PE-PM-10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.60 TPY of PE-PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

24. Emissions Unit Group -Roll mills 1,3,and 4: P502,P504,P505,

EU ID	Operations, Property and/or Equipment Description
P502	110S, Building 21
P504	109S, Building 21
P505	Roll Mill 4, Building 12, ID 41

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) d)(3).

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 14-05390 issued 6/17/2003)	Particulate emissions and Particulate matter less than 10 microns in diameter (PE-PM10) shall not exceed 0.03 pound (lb)/hour* (hr) and 0.12 ton per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 4.40 lbs/hr* and 19.27 TPY. *The hourly emission limitations are based on the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance. See b)(2)c. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(B)(1), 3745-17-08(B), and 3745-31-05(D).

b.	OAC rule 3745-31-05 (D) (PTI 14-05390 issued 6/17/2003)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-08(B)	The permittee shall unload all solid materials in a manner to minimize or eliminate visible particulate emissions.
d.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a three - minute average, except as specified by rule.

(2) Additional Terms and Conditions

a. The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

b. The total combined VOC emissions from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 39.9 tons per year based upon a rolling, 12-month summation.

c. The PE from this emissions unit shall be vented to a building enclosure at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the identification of each batch made (product code);

b. the batch size, in pounds;

c. the total pigment content of each batch, in pounds;

d. the liquid volatile organic compound input for each batch, in pounds;

e. the individual organic HAP content of each batch, in percent by weight of individual HAP;

f. the total combined organic HAP content of each batch, in pounds of combined HAP [sum of all the individual organic HAP contents from d)(1)e.];

g. if any inorganic HAP materials are employed, the individual inorganic HAP content of each batch, in pounds of individual HAP;

h. if any inorganic HAP materials are employed, the total combined inorganic HAP content of each batch, in pounds of combined HAP [sum of all the individual inorganic HAP contents from d)(1)g.].

i. the liquid organic cleanup material employed, in pounds;

j. if any organic HAP containing cleanup materials are employed, the individual organic HAP content of each cleanup material, in percent by weight of individual HAP;

k. if any organic HAP containing cleanup materials are employed, the total combined organic HAP content of each cleanup material, in percent by weight of combined HAP [sum of all the individual organic HAP contents from d)(1)j.].

l. the total monthly emissions, in pounds, calculated as below; and

Monthly VOC emissions = sum of [d)(1)d. * 0.015 lb. of VOC emissions/lb. of VOC input] for all batches made per month + d)(1)i.

Monthly single HAP emissions for each HAP = sum of [d)(1)e. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made per month + sum of [d)(1)g. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of (d)(1)i. * d)(1)j.) for all liquid organic cleanup materials used.

Monthly total HAP emissions = sum of [d)(1)f. * 0.015 lb. of HAP emissions/lb. of HAP] for all batches made + sum of [d)(1)h. * 0.001 lb. of HAP emissions/lb. of HAP * (1-0.95 control efficiency for baghouse)] for all batches made + sum of all (d)(1)i. * d)(1)k. for all liquid organic cleanup materials used.

m. the total combined rolling, 12-month summation of VOC emissions, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below.

Rolling, 12-month summation of VOC emissions = (monthly VOC emissions from d)(1)l. + sum of monthly VOC emissions from previous 11 calendar months)/2000.

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) The permittee shall maintain monthly records of the following:

a. the total combined monthly VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 in tons; and

b. the total combined rolling, 12-month summation of the VOC input, in tons, from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 as calculated below:

Rolling, 12-month summation of VOC input = (monthly VOC input from d)(2)a. + sum of monthly VOC input from previous 11 calendar months).

Authority for Term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(3) 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 Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene

TLV (ug/m3): 434,192

Maximum Hourly Emission Rate (lbs/hr): 36.1

(Emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487,P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507, combined)

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 6997

MAGLC (ug/m3): 10,338

Physical changes to or 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 Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "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 with the above changes, the Ohio EPA will not consider the change(s)to be a "modification" under OAC rule 3745-31-01(QQQ), 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 (QQQ)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will 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. When the 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.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-05390: d)(1)-d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify each exceedance of the limitations specified in b)(2)a. and b)(2)b.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to

Install 14-05390: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) The permittee may determine the VOC content of materials based on formulation data, and may rely on volatile matter content data provided by material suppliers. In the event of any inconsistency between the formulation data and the results of Test Methods 24 or 24A of 40 CFR Part 60, Subpart A, Test Methods 24 or 24A shall be used unless the permittee can demonstrate to the satisfaction of the agency that the formulation data is correct.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(2) Emission limitation:

Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1))

(3) Emission limitation:

4.40 lbs. of VOC/hr.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 1.5% VOC loss from AP-42, 6.4-1 (5/83), Uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(4) Emission limitation:

19.27 TPY of VOC.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(5) Emission limitation:

The total combined VOC emissions shall not exceed 39.9 TPY of VOC, based upon a rolling, 12-month summation from emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(6) Production limitation:

The total combined VOC input for emissions units P476, P477, P478, P479, P480, P481, P482, P483, P484, P485, P486, P487, P488, P489, P490, P491, P492, P493, P494, P495, P496, P497, P498, P499, P500, P501, P502, P504, P505, P506 and P507 shall not exceed 2660 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined based on record keeping in d)(2).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(D))

(7) Emission limitation:

0.03 lb./hr of PE-PM-10.

Applicable compliance method:

The lbs/hr emission limitation was based on the emissions unit's worst case production multiplied by the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), uncontrolled emission factors for paint and varnish manufacturing.

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(8) Emission limitation:

0.12 TPY of PE-PM10.

Applicable compliance method:

Compliance with the PE-PM10 emissionlimitation shall be determined by multiplying the emission factor of 2 lbs. of PE-PM10/ton of material charged from AP-42, Table 6.7-1 (5/83), Emission factors for printing ink manufacturing, by the sum of all pigment usage totals in d)(1).

Authority for term: (OAC rules 3745-77-07(C)(1) and 3745-31-05(A)(3))

(9) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-05390: f)(1)-f)(8). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.