



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

1/13/2012

Mr. John Dimino  
HA INTERNATIONAL LLC  
4243 SOUTH AVE  
Toledo, OH 43615

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

Facility ID: 0448011215  
Permit Number: P0109052  
Permit Type: Administrative Modification  
County: Lucas

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

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

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

If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: TDES





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
HA INTERNATIONAL LLC**

Facility ID:	0448011215
Permit Number:	P0109052
Permit Type:	Administrative Modification
Issued:	1/13/2012
Effective:	1/13/2012
Expiration:	11/1/2015





Division of Air Pollution Control
Permit-to-Install and Operate
for
HA INTERNATIONAL LLC

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## Authorization

Facility ID: 0448011215  
Application Number(s): M0001460  
Permit Number: P0109052  
Permit Description: Permit was modified to account for the presence of HAPs and to add tracking of HAPs emissions. The process was not physically modified.  
Permit Type: Administrative Modification  
Permit Fee: \$0.00  
Issue Date: 1/13/2012  
Effective Date: 1/13/2012  
Expiration Date: 11/1/2015  
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

HA INTERNATIONAL LLC  
4243 SOUTH AVE  
TOLEDO, OH 43615

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

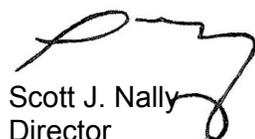
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604  
(419)936-3015

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0109052  
Permit Description: Permit was modified to account for the presence of HAPs and to add tracking of HAPs emissions. The process was not physically modified.

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

<b>Emissions Unit ID:</b>	<b>P025</b>
Company Equipment ID:	NA
Superseded Permit Number:	P0106804
General Permit Category and Type:	Not Applicable

## **A. Standard Terms and Conditions**

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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Toledo Department of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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<sup>1</sup>Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

## **B. Facility-Wide Terms and Conditions**

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

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

(1) None.

2. The combined emissions of Volatile Organic Compounds (VOC) from all emission units at this facility shall not exceed 40.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

a) **VOC emissions:**

The combined facility-wide emissions of VOC shall include the following emission units: P002, P005, P010, P011, P018, P019, P021, P022, P023, and P025.

(1) The permittee shall collect and record the following information monthly for the purpose of determining compliance with the rolling, 12-month VOC emission limitation for all emissions units facility-wide:

a. For P002, P005, P010, P011, P018, P019, P021, P022, and P023:

- i. the company identification for each product manufactured;
- ii. the number of tons of all VOC-containing liquid organic materials mixed where the vapor pressure of the VOC-containing liquid organic materials is less than or equal to 1.9 kPa;
- iii. the number of tons of all VOC-containing liquid organic materials mixed where the vapor pressure of the VOC-containing liquid organic materials is greater than 1.9 kPa;
- iv. the VOC emission rate from all VOC-containing liquid organic materials mixed where the vapor pressure of the VOC-containing liquid organic material is less than or equal to 1.9 kPa, i.e., ((ii.)x(0.005)) in tons per month;
- v. the VOC emission rate from all VOC-containing liquid organic materials mixed where the vapor pressure of the VOC-containing liquid organic material is greater than 1.9 kPa, i.e., ((iii.)x(0.034)) in tons per month;
- vi. the monthly total VOC emissions rate from all VOC-containing liquid organic materials calculated as the sum of (iv.) + (v.), in tons per month; and
- vii. the combined facility-wide rolling, 12-month summation of the VOC emissions for all emissions units named above, calculated by adding the current month's VOC emissions from all emission units at this facility to the VOC emissions for the preceding eleven calendar months from all

emission units at this facility, in tons per year, i.e., the rolling, 12-month summation of (vi.) for all emissions units named above.

- b. For P025:
  - i. the company identification for each VOC-containing liquid organic product transferred;
  - ii. the number of tons of all VOC-containing liquid organic material transferred;
  - iii. the monthly total VOC emission rate from all VOC-containing liquid organic materials transferred calculated as [(ii.)]\*[0.011 ton VOC/ton material transferred] in tons per month; and
  - iv. the combined facility-wide rolling, 12-month summation of the VOC emissions for all emissions units named above, calculated by adding the current month's VOC emissions from all emission units at this facility to the VOC emissions for the preceding eleven calendar months from all emission units at this facility, in tons per year, i.e., the rolling, 12-month summation of (iii.) for all emissions units named above.
- c. the rolling, 12-month summation of the facility-wide VOC emissions, calculated by adding the current month's VOC emissions from all emission units at this facility to the VOC emissions for the preceding eleven calendar months from all emission units at this facility, in tons per year, i.e. [(2.a.vii.) + (2.b.iv.)].

3. The combined facility-wide emissions of hazardous air pollutants (HAPs) from all emission units at this facility shall not exceed 8.0 tons per year individual HAP and 20.0 tons per year of any combination of HAPs, based upon a rolling, 12-month summation of the monthly emissions.

b) **HAPs emissions:**

The combined emissions of HAPs shall include the following emission units: P002, P005, P010, P011, P018, P019, P021, P022, P023, and P025.

- (1) The permittee shall collect and record the following information for each month for all emissions units located at this facility:
  - a. For P002, P005, P010, P011, P018, P019, P021, P022, and P023:
    - i. the company identification for each product manufactured;
    - ii. the tons of individual HAPs from all liquid organic materials mixed, in ton HAPs per ton of liquid organic material;
    - iii. the tons of individual HAPs emissions from all liquid organic materials mixed, i.e., ((ii.)x(0.034)) in tons individual HAP, per month;
    - iv. the combined facility-wide rolling, 12-month summation of the individual HAPs emissions for all liquid organic materials mixed, calculated by adding the current month's individual HAPs from all liquid organic

materials mixed at this facility to the HAPs for the preceding eleven calendar months, in tons per year, i.e., the 12-month summation of (iii.) for all individual HAPs;

- v. the tons of combined HAPs from all liquid organic materials mixed in ton HAPs per ton of liquid organic material;
- vi. the tons of combined HAPs emissions from all liquid organic materials mixed, i.e.,  $((v.) \times (0.034))$  in tons combined HAP per month; and
- vii. the combined facility-wide rolling, 12-month summation of the combined HAPs emissions for all liquid organic materials mixed, calculated by adding the current month's combined HAPs emissions from all liquid organic materials mixed at this facility to the combined HAP emissions for the preceding eleven calendar months, in tons per year, i.e., the rolling, 12-month summation of (vi.).

b. For P025:

- i. the company identification for each material transferred;
- ii. the tons of individual HAP in all liquid organic materials transferred, in ton HAP per ton liquid organic material;
- iii. the tons of individual HAP emissions from all liquid organic materials transferred, i.e.,  $((ii.) \times (0.011))$ , in tons individual HAP per month;
- iv. the combined facility-wide rolling, 12-month summation of the individual HAP emissions for all liquid organic materials transferred, calculated by adding the current month's individual HAP emissions from all liquid organic materials transferred at this facility to the HAP emissions for the preceding eleven calendar months, in tons per year, i.e., the 12-month summation of (iii.) for all individual HAPs;
- v. the tons of combined HAPs in all liquid organic materials transferred, in ton HAP per ton liquid organic material;
- vi. the tons of combined HAPs emissions from all liquid organic materials transferred, i.e.,  $((v.) \times (0.011))$ , in tons combined HAPs per month; and
- vii. the combined facility-wide rolling, 12-month summation of the combined HAPs emissions for all liquid organic materials transferred, calculated by adding the current month's combined HAPs emissions from all liquid organic materials transferred at this facility to the combined HAPs emissions for the preceding eleven calendar months, in tons per year, i.e., the 12-month summation of (vi.).

4. The permittee shall submit quarterly deviation (excursion) reports that identify all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- a) an identification of each month during which the facility-wide VOC emissions exceeded 40.0 tons as a rolling, 12-month summation, and the actual 12-month summation of any such VOC emissions for each such month;
- b) an identification of each month during which the combined facility-wide emissions of any individual HAP exceeded 8.0 tons per rolling 12-month period, and the actual 12-month summation of any such HAP emissions for each such month;
- c) an identification of each month during which the combined facility-wide emissions of combined HAPs exceeded 20.0 tons per rolling, 12-month period, and the actual 12-month summation of any such HAP emissions for each such month; and
- d) If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

## **C. Emissions Unit Terms and Conditions**



1. P025

Operations, Property and/or Equipment Description:

Organic Liquid Repackaging Operation

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(2).
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)c., and f)(1)c. through f)(1)e.
- 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	Volatile organic compounds (VOC) emissions shall not exceed 5.5 pounds per hour; and  see b)(2)a. and b.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-31-05(D)	facility-wide VOC shall not exceed 40 tons as a rolling, 12-month summation; and  facility-wide emissions of hazardous air pollutants (HAP) shall not exceed 8 tons individual, or 20 tons of any combination of HAPs as a rolling, 12-month summation  see b)(2)d.
d.	OAC rule 3745-31-05(E)	VOC emissions from this emissions unit shall not exceed 1.1 tons as a rolling, 12-



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		month summation
e.	ORC 3704.03(F)(3)(c) and F(4)	See d)(3).

(2) Additional Terms and Conditions

- a. 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.
- b. The hourly and annual emission limitations were established 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. 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 emissions from this air contaminant source since the potential to emit for VOC is less than 10 tons/year.

The emission limitations and control requirements from the amended rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit shall become void after the U.S. EPA approves the rule revision. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

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

- d. The annual VOC and HAP emission limitations were established for PTI purposes with additional recordkeeping and/or reporting requirements included in Part B. Facility-wide Terms and Conditions to ensure compliance with these limitations.

c) Operational Restrictions

- (1) The maximum annual amount of material transferred shall not exceed 200,000 pounds, based upon a rolling, 12-month summation of the throughput rates.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the material transfer rate for each month, in pounds; and
  - b. the rolling, 12-month summation of the material transfer rates, in pounds per year.
- (2) 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 federally enforceable permit to install and operate (FEPTIO) 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 toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall identify the following information in the annual permit evaluation report:
  - a. all exceedances of the maximum allowable cumulative material transfer rate levels.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the emission limitations in b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission limitation:  
  
5.5 pounds per hour of VOC from this emissions unit.  
  
Applicable compliance method:  
  
This emission limitation was established to reflect the potential to emit for this emissions unit through calculations based on one-third of the emission factors specified in the STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing

Facilities, page 8.5-4, dated February 2005, as follows: multiply the emission factor in pounds of VOC emissions per pound of material transferred (0.011) by the maximum rate of material transferred (500 pounds of material transferred/hr).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and Method 25 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

b. Emission Limitation:

1.1 tons VOC as a rolling, 12-month summation from this emissions unit.

Applicable Compliance Method:

This emission limitation was established by calculations based on the worst case operating scenario, as follows: multiply the maximum annual rate of material transfer (200,000 lbs/yr) by an emission factor one-third of the emission factor specified in the STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005 (0.011 pound of VOC per pound of organic material transferred) and dividing by 2,000 pounds/ton.

If required the permittee shall establish a site specific emission factor based on EPA approved test procedures.

c. Emission limitation:

40 tons per year VOC facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.2. of this permit.

d. Emission limitation:

8 tons per year individual HAP facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.3. of this permit.

e. Emission limitation:

20 tons per year combined HAPs facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.3. of this permit.

- g) Miscellaneous Requirements
  - (1) None.