

1/18/2012

Certified Mail

Sean Denman
The Sherwin-Williams Co.
26300 Fargo Avenue
Bedford Heights, OH 44146

Facility ID: 1318040267
Permit Number: P0095112
County: Cuyahoga

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

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 12/15/2011. 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	and	Cleveland Division of Air Quality
Permit Review/Development Section		2nd Floor
Ohio EPA, DAPC		75 Erievue Plaza
50 West Town Street, Suite 700		Cleveland, OH 44114
P.O. Box 1049		
Columbus, Ohio 43216-1049		

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, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Cleveland Division of Air Quality



Response to Comments

Facility ID:	1318040267
Facility Name:	The Sherwin-Williams Co.
Facility Description:	Spray paint can filling operation.
Facility Address:	26300 Fargo Avenue Bedford Heights, OH 44146 Cuyahoga County
Permit:	P0095112, 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 Plain Dealer on 12/17/2011. The comment period ended on 01/16/2012.	
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: None

- a. Comment: None
- b. Response: None

There were no comments received during the above comment period.



PRELIMINARY PROPOSED

Division of Air Pollution Control Title V Permit for The Sherwin-Williams Co.

Facility ID:	1318040267
Permit Number:	P0095112
Permit Type:	Renewal
Issued:	1/18/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
The Sherwin-Williams Co.

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Authorization

Facility ID: 1318040267
Facility Description: Spray paint can filling operation.
Application Number(s): A0026637
Permit Number: P0095112
Permit Description: This is a renewal Title V permit for two aerosol can filling lines (P004 and P005) with the gashouse operations controlled by a thermal incinerator. PTI 13-3186 was issued 2/26/97 and modified 4/30/97.
Permit Type: Renewal
Issue Date: 1/18/2012
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0095111

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

The Sherwin-Williams Co.
26300 Fargo Avenue
Bedford Heights, OH 44146

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

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

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 Cleveland Division of Air Quality. 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 Cleveland Division of Air Quality.

(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.

- f) 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; or
 - (2) the 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
 - (3) 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 contaminant 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.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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.)

25. 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.

26. 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))

27. 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).

28. 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))

29. 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.

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

<u>EU ID</u>	<u>Operations, Property and/or Equipment Description</u>
B008	Emergency Diesel Fire Pump - PBR 2047 issued 8/14/06

Each insignificant emissions unit at this facility must comply with all applicable State and Federal regulations, as well as any emissions limitations and/or control requirements contained within a permit-to-install for that 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 federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

[Authority for term: OAC rule 3745-77-07(A)(13)]

3. Pursuant to 40 CFR Part 64, the permittee has submitted and the Ohio EPA has approved a compliance assurance monitoring (CAM) plan for VOC emissions for emissions units P004 and P005 at this facility. The permittee shall comply with the provisions of the plan during any operation of the aforementioned emissions units.

[Authority for term: 40 CFR Part 64]

C. Emissions Unit Terms and Conditions

1. P004, Line # 6

Operations, Property and/or Equipment Description:

Aerosol filling line (liquid mixing, liquid filling of aerosol cans, propellant filling of aerosol cans by under-the-cup fill, propellant line purging, and manual cleaning of filled aerosol cans) with the gashouse operations (propellant filling and propellant line purging) controlled by a thermal incinerator.

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 13-3186 issued 2/26/97 and modified 4/30/97	The requirements of this rule includes compliance with OAC rule 3745- 21-09(RR)
b.	OAC rule 3745-21-09(RR)	See b)(2)a. below.
c.	OAC rule 3745-17-07(A)	During the loading of solid material into a liquid mixing tank, visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	During the loading of solid material into a liquid mixing tank, particulate emissions shall not exceed 0.551 pounds/hour (based on Table 1).
e.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See c)(2), d)(1), d)(2), d)(11), e)(2), and f)(4) below.

(2) Additional Terms and Conditions

a. For the liquid mixing tanks, can liquid filling operations, gasser (gashouse)operations (can propellant filling operations and propellant line purging operations), and can brushing operations(manual can cleaning operations), the total VOC emissions in any rolling, 12-month period shall not exceed 0.75 pound of VOC per 1000 aerosol cans produced.

c) Operational Restrictions

- (1) Whenever the gashouse production line is in VOC operation, the emissions from the gashouse production line, except during a safety diversion or emergency described under f)(4), shall be vented to the thermal incinerator that is designed and operated with a destruction efficiency greater than or equal to 90% by weight for VOC. A gashouse production line is in VOC operation when either the propellant being used to fill the aerosol cans contains VOC or the propellant being purged from the propellant line contains VOC. The VOC propellant being purged shall be recovered and stored in a fuel tank of the thermal incinerator.

[Authority for term: OAC rule 3745-21-09(RR)(2)]

- (2) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit's gashouse is vented to the thermal incinerator, shall not be more than 50 degrees Fahrenheit below the average combustion temperature during the most recent emissions test during which the destruction efficiency and mass emission rate of the thermal incinerator were determined as specified under f)(2)e., and the test results showed compliance with the VOC emissions limit for this emissions unit as specified under f)(1).

[Authority for term: OAC rule 3745-21-09(RR)(3) and 40 CFR Part 64]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain the following continuous monitoring devices:
 - a. a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator. The temperature monitor shall have a minimum accuracy of plus or minus one per cent of the temperature being monitored expressed in degrees Fahrenheit or plus or minus one degree Fahrenheit, whichever is greater. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the owner or operator.
 - b. a lower explosive limit (LEL) monitoring system that continuously measures and records the concentration of VOC and percent LEL within each gashouse line and the inlet vent to the thermal incinerator. The LEL detectors shall have a minimum accuracy of plus or minus two per cent. The LEL detectors shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations. The owner or operator shall calibrate the LEL detectors once per month following the manufacturer's protocol and shall record the date and results of each calibration.
 - c. a mass flow meter that continuously measures and records the flow rate within each gashouse line. The mass flow meters shall have a minimum accuracy of plus or minus 1.5 per cent. The mass flow meters shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations. The owner or operator shall check the mass flow meters once every six months for

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accuracy using a pilot tube and shall record the date and results of each accuracy check.

[Authority for term: OAC rule 3745-21-09(RR)(4)(a)(i)-(iii) and 40 CFR Part 64]

- (2) The permittee shall collect and record the following information for each day of gashouse operation:
- a. a log of operating time for each of the following: gashouse production line ventilation to the thermal incinerator, gashouse production line ventilation directly to ambient air, thermal incinerator operation, temperature monitoring equipment operation, gashouse production line in VOC operation, and gashouse production line not in VOC operation;
 - b. a log of all three-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit's gashouse is in VOC operation, was more than fifty degrees Fahrenheit below the average combustion temperature during the most recent emissions test during which the destruction efficiency of the thermal incinerator was determined under f)(2)e. and the test results showed compliance with the VOC emissions limit for this emissions unit as specified in f)(1); and
 - c. a log of the dates and times of the bypass venting of gashouse emissions to ambient air (see safety diversions under f)(4)) and any downtime for the thermal incinerator and temperature monitoring equipment, when the emissions unit's gashouse is in VOC operation.

[Authority for term: OAC rule 3745-21-09(RR)(4)(b)(i)-(iii) and 40 CFR Part 64]

- (3) The permittee shall collect and record for this emissions unit the number of aerosol cans produced each day and maintain that information at the facility.

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

- (4) The permittee shall collect and record for each aerosol can production line at this facility the following production information each month:
- a. number of aerosol cans produced (sum of daily d)(3) data);
 - b. name and amount (in pounds) of each VOC liquid charged to the mixing tanks and filled into aerosol cans;
 - c. number of aerosol cans filled with a VOC propellant by name of propellant, type of propellant filler (under-the-cup fill, needle fill, or Sepro fill), and type of emissions venting (vented to thermal incinerator or not vented to thermal incinerator);
 - d. number of VOC propellant line purges by name of propellant, type of recovery (recovered for fuel tank of thermal incinerator or not recovered), and type of emissions venting (vented to thermal incinerator or not vented to thermal incinerator);

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- e. name and amount (pounds) of each VOC liquid (solvent) used in the manual aerosol can cleaning operation (can brushing operation); and
- f. the number of safety diversion events and number of safety diversions events that are not emergency events (see safety diversions under f)(4))

[Authority for term: OAC rule 3745-21-09(RR)(4)(c)(i)-(vi)]

- (5) The permittee shall collect and record for this emissions unit the following chemical and physical properties for the VOC liquids and VOC propellants used in this emissions unit:
 - a. for any VOC liquid used in liquid mixing and liquid filling of aerosol cans, the liquid name, the liquid density (lbs/gal), and the vapor pressure (mmHg) at seventy degrees Fahrenheit and eighty degrees Fahrenheit;
 - b. for any VOC liquid used in manual aerosol can cleaning, the liquid name and the liquid density (lbs/gal); and
 - c. for any VOC propellant, the liquid density (lbs/gal) under usual propellant storage temperature and pressure, the vapor density (lbs/cc) at propellant filler temperature, the fraction VOC by weight, the molecular weight, and the lower explosive limit (LEL) concentration (ppmv).

[Authority for term: OAC rule 3745-21-09(RR)(4)(d)(i)-(iii)]

- (6) The permittee shall calculate and record for each month the following information for this emissions unit:
 - a. monthly amount of VOC emissions (pounds) from the liquid mixing operations, in accordance with f)(2)a.;
 - b. monthly amount of VOC emissions (pounds) from the can liquid filling operations, in accordance with f)(2)b.;
 - c. monthly amount of VOC emissions (pounds) from the gashouse operations (propellant filling, propellant line purging, and safety diversions), in accordance with f)(2)c.;
 - d. monthly amount of VOC emissions (pounds) from the manual aerosol can cleaning operations (can brushing operations), in accordance with f)(2)d.;
 - e. monthly number of aerosol cans produced (sum of daily d)(3) data); and
 - f. monthly amount of VOC emissions (pounds) from this emissions unit which is the sum of data recorded under d)(6)a. through d)(6)d.

[Authority for term: OAC rule 3745-21-09(RR)(4)(e)(i)-(v)]

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- (7) The permittee shall calculate and record for each month the following information for emissions units P004 and P005:
- a. monthly amount of VOC emissions (pounds), which is the sum of the monthly VOC emissions recorded under d)(6)f. for emissions units P004 and P005;
 - b. monthly amount of aerosol cans produced, which is a sum of the monthly aerosol can production recorded under d)(6)e. for emissions units P004 and P005;
 - c. monthly VOC emissions rate in pound/1000 cans, which is 1000 times the value from d)(7)a. divided by the value from d)(7)b. and rounded to two decimal places;
 - d. amount of VOC emissions (pounds) during the rolling 12-month period, which is the sum of values recorded under d)(7)a. for this month and the previous 11 consecutive months;
 - e. number of aerosol cans produced during the rolling 12-month period, which is the sum of the values recorded under d)(7)b. for this month and the previous 11 consecutive months.
 - f. VOC emissions rate during the rolling 12-month period in pound/1000 cans, which is 1000 times the value from d)(7)d. divided by the value from d)(7)e., and rounded to two decimal places.

[Authority for term: OAC rule 3745-21-09(RR)(4)(g)(i)-(v)]

- (8) The permittee shall collect and record for P004 and P005, the following information for each safety diversion event, as described in f)(4).
- a. 20% LEL stamp, which indicates that a concentration between 20% and 40% of the LEL occurred;
 - b. date and time of the 20% LEL stamp;
 - c. event length (seconds);
 - d. type of VOC propellant being employed in the gashouse;
 - e. average concentration of LEL detectors in gashouse line (ppmv);
 - f. average flow rate (cfm); and
 - g. amount of VOC emissions (pounds).

[Authority for term: OAC rule 3745-21-09(RR)(4)(h)(i)-(vii)]

- (9) Visible Emissions from Mixing Tanks
- a. The permittee shall perform weekly checks, when solid materials are added to the mixing tanks of this emissions unit and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving the mixing tanks. The presence or absence of any visible emissions shall be noted in an operations log.

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If visible emissions are observed, the permittee shall also note the following in the operations log:

- i. the color of the emissions;
 - ii. whether the emissions are representative of normal operations;
 - iii. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - iv. the total duration of any visible emissions incident; and
 - v. any corrective actions taken to eliminate the visible emissions.
- b. In the event of two consecutive quarters in which no visible emissions are observed under d)(9)a. for all mixing tanks of this emissions unit, the permittee can elect to perform checks for visible emissions on a monthly basis in the manner described under d)(9)a. If visible emissions are subsequently observed during any month, the permittee shall immediately go back to checks for visible emissions during each week as described under d)(9)a. and the permittee may again elect to use the provisions under this section.

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

- (10) The records required in d) shall be maintained for a minimum of five years and shall be available for review by the director or any authorized representative of the director during normal business hours.

[Authority for term: OAC rule 3745-77-07(C) and OAC rule 3745-21-09(RR)(4)(i)]

- (11) The CAM plan for this emissions unit has been developed for VOC emissions. The CAM performance indicator for VOC emissions is the record keeping program for the emissions unit and its control equipment.

The CAM performance indicator device to continuously monitor the combustion temperature of the thermal incinerator when the emissions unit is in operation is specified in c)(2). When the monitoring requirements are outside of any parameters specified in c)(2) and d)(1), corrective action (including, but not limited to, an evaluation of the emissions unit and the control device) will be required.

Upon detecting an excursion of any of the VOC emission indicator parameters listed above, the owner or operator shall restore operation of the emissions unit (including the control devices) to its normal or usual manner of operation as expeditiously as practical 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, or any necessary follow-up actions to return operation to within the indicator range.

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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 64.8.

[Authority for term: OAC rule 37-45-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

- (1) 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

[Authority for term: OAC rule 3745-15-03(A)]

- (2) The permittee shall submit quarterly compliance status reports:
 - a. that identify any emission rate violation in which the emission rate recorded under d)(7)f. exceeds the VOC emission limitation specified in b)(2)a.;
 - b. that identify any deviations of the requirements specified in c)(1) and c)(2) as recorded in d)(2)b. and d)(2)c.;and
 - c. that provide summaries of records required in d)(1) through d)(8).

These quarterly compliance status reports shall be submitted by April 30, July 31, October 31, and January 31 and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-21-09(RR)(5)(a)(i)-(ii), (5)(b)]

- (3) The permittee shall submit quarterly written reports that identify:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These quarterly compliance status reports shall be submitted by April 30, July 31, October 31, and January 31 and shall cover the records for the previous calendar quarters. [Authority for term: OAC rule 3745-77-07(A)(3)(c)]

f) Testing Requirements

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

a. Emission Limitation:

For the liquid mixing tanks, can liquid filling operations, gasser operations, and can brushing operations, at this facility, the total VOC emissions in any rolling 12-month period shall not exceed 0.75 pound of VOC per 1000 aerosol cans produced.

Applicable compliance method:

Compliance shall be demonstrated by means of:

- i. recordkeeping specified in d)(4), d)(5), d)(6), and d)(7) of the terms and conditions of emissions units P004 and P005;
- ii. calculating the VOC emissions rate for the mixing tanks (mixing operations), can liquid filling operations, gasser operations (gashouse operations), can brushing operations (manual can cleaning), and can piercing operations at this facility, as specified in f)(2)a. of the terms and conditions of emissions units P004 and P005;
- iii. testing the thermal incinerator, as specified in f)(2)e. of the terms and conditions of emissions units P004 and P005; and
- iv. operating and maintaining a continuous temperature monitor and recorder for the thermal incinerator and maintaining a log of gashouse operations, as specified in d)(1) and d)(2) of the terms and conditions of emissions units P004 and P005.

In the event additional emissions testing is required to demonstrate compliance, the VOC emissions shall be determined in accordance with US EPA 40 CFR, Part 60, Method 25.

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

b. Emission Limitation:

During the loading of solid material into a liquid mixing tank, particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

The liquid mixing tanks for this emissions unit are similar to the mixing tanks at paint manufacturing facilities in which the particulate emissions are estimated to be 0.5 to 1.0 percent of the pigment handled, based on USEPA reference document AP-42: Compilation of Air Pollutant Emissions Factors, Fifth Edition (Table 6.4-1 which has a "C" emission factor rating). This facility infrequently adds some pigment to the liquid mixing tanks, and such infrequent and low usage of pigment would not normally cause particulate emissions to exceed this emission limitation. Compliance with the visible particulate emissions limitation under f)(1)c. provides further assurance of compliance of this emissions limitation.

In the event testing is required to demonstrate compliance, the particulate emissions shall be determined by USEPA Method 5, 40CFR 60, Appendix A.

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

c. Emission Limitation:

During the loading of solid material into a liquid mixing tank, visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be demonstrated by the recordkeeping in d)(9) and reporting in e)(3).

In the event additional emissions testing is required to demonstrate compliance, the visible emissions shall be determined in accordance with 40 CFR, Part 60, Appendix A, Method 9.

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

(2) The VOC emissions calculations for this facility were taken in part from the permittee's Air Pollution Emission Model. The VOC emissions from this emissions unit shall be calculated as follows:

a. For liquid mixing operations, the monthly VOC emissions (pounds), E(mixing), shall be calculated as follows:

i. $E(\text{mixing}) = E_i(\text{loading}) + E_i(\text{venting})$

where:

$E(\text{loading})$ = monthly VOC emissions from loading VOC liquids into mixing tanks

$E(\text{venting})$ = monthly VOC emissions from venting VOC liquids during mixing

ii. For loading VOC liquid into a mixing tank, the monthly VOC emissions shall be calculated, based on the ideal gas law and displacement of saturated vapors at 70 degrees Fahrenheit (21 degrees Celsius), as follows:

$E(\text{loading})$ = monthly sum of $E_i(\text{loading})$ for all VOC liquid "i" loaded into mixing tanks

$E_i(\text{loading}) = (P_i * X_i * V_i * MW_i) / (R * T)$

where:

$E_i(\text{loading})$ = pounds of VOC emissions during the month from loading VOC liquid "i" into mixing tanks

P_i = vapor pressure of VOC liquid "i" at 70 degrees Fahrenheit, in mmHg

X_i = mole fraction of VOC liquid "i" in liquid mix (value of one is used for this emissions estimate)

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V_i = volume of VOC liquid "i" charged to mixing tanks during the month in cubic feet (equals monthly gallons of liquid "i" divided by 7.48 gallons per cubic foot)

R = 999 mmHg-cubic feet/lbmole-degrees Kelvin

T = temperature in degrees Kelvin (which equals degrees Celsius plus two hundred seventy-three), so 70°F = 21°C = 294°K

MW_i = molecular weight of VOC liquid "i", in lbs/lb mole

- iii. For venting of VOC liquids during mixing, the monthly VOC emissions shall be calculated, based on the ideal gas law and venting of saturated vapors at 80 degrees Fahrenheit (27 degrees Celsius), as follows:

$E(\text{venting})$ = monthly sum of $E_i(\text{venting})$ for all VOC liquid "i" loaded into mixing tanks

$$E_i(\text{venting}) = (P_i * X_i * V_{i,v} * MW_i) / (R * T)$$

where:

$E_i(\text{venting})$ = pounds of VOC emissions during the month for venting a VOC liquid "i" during mixing

P_i = vapor pressure of VOC liquid "i" at 80 degrees Fahrenheit, in mmHg

X_i = mole fraction of VOC liquid "i" in liquid mix (a value of 1 is used for this emissions estimate)

$V_{i,v}$ = volume (cubic feet) of saturated vapors removed by the ventilation system during mixing of VOC liquid "i" (equals monthly gallons of VOC liquid "i" times 5*30/350 based on 5% of the total ventilation flow rate or 5 cubic ft/min, an average mixing time of 30 min/batch, and a typical batch size of 350 gallons)

R = 999 mmHg-cubic feet/lb mole-degrees Kelvin

T = temperature in degrees Kelvin (which equals degrees Celsius plus two hundred seventy-three), so 80°F = 27°C = 300°K

MW_i = molecular weight of VOC liquid "i", in lbs/lb mole

- iv. Alternative method to f)(2)a.i. through f)(2)a.iii.

An alternative method for calculating the monthly emissions rate for liquid mixing operations shall be as follows:

$$E(\text{mixing}) = EFM * V(\text{mixing})$$

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where:

EFM = emission factor of 0.00131 lb VOC/lb VOC liquid throughput (this emission factor is based on the highest annual average emission factor for mixing operations during 1997 to 2000)

V(mixing) = monthly throughput of VOC liquid employed for mixing, in pounds

- v. If for any month in which the use of the alternative method shows noncompliance with the VOC emissions limit, the method described in f)(2)a.i. through f)(2)a.iii. shall be used to calculate monthly emissions. The compliance determination will then be based on these more detailed calculations.

[Authority for term: OAC rule 3745-21-09(RR)(6)(a)(i)-(v)]

- b. VOC emissions from liquid filling of aerosol cans.

- i. For the liquid filling of aerosol cans, the monthly VOC emissions (pounds) shall be calculated, based on the ideal gas law and displacement of saturated vapors at 70 degrees Fahrenheit (21 degrees Celsius) as follows:

E(filling) = monthly sum of $E_i(\text{filling})$ for all VOC liquid "i" filling of aerosol cans

$$E_i(\text{filling}) = (P_i * X_i * V_i * MW_i) / (R * T)$$

where:

$E_i(\text{filling})$ = pounds of VOC emissions during the month for VOC liquid "i" filling of aerosol cans

P_i = vapor pressure of VOC liquid "i" at 70 degrees Fahrenheit, in mmHg

X_i = mole fraction of VOC liquid "i" in liquid fill (a value of 1 is used for this emissions estimate)

V_i = volume of VOC liquid "i" filled into aerosol cans during the month in cubic feet (equals monthly gallons of VOC liquid "i" divided by 7.48 gal/cu ft)

R = 999 mmHg-cubic ft/lb mole-degrees Kelvin

T = temperature in degrees Kelvin (which equals degrees Celsius plus two hundred seventy-three), so 70°F = 21°C = 294°K

MW_i = molecular weight of VOC liquid "i", in lbs/lb mole

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ii. Alternative method to f)(2)b.i.

An alternative method for calculating the monthly emissions for liquid can filling operations shall be as follows:

$$E(\text{filling}) = \text{EFF} * V(\text{filling})$$

where:

EFF = emission factor of 0.00026 lb VOC/lb VOC liquid throughput (this emission factor is based on the highest annual average emission factor for liquid can filling operations during 1997 to 2000)

V(fillings) = monthly throughput of VOC liquid employed for can filling, in pounds

iii. If for any month in which the use of this alternative method shows noncompliance with the VOC emission limit, the method described in f)(2)b.i. shall be used to calculate monthly emissions for liquid filling of aerosol cans. The compliance determination will then be based on these more detailed calculations.

[Authority for term: OAC rule 3745-21-09(RR)(6)(b)(i)-(iii)]

c. VOC emissions from gasser (gashouse) operations.

i. For the gasser operations, the monthly VOC emissions in pounds, EG(total), shall be calculated as follows:

$$EG(\text{total}) = EG(\text{filling}) + EG(\text{purging}) + EG(\text{safety diversions})$$

where:

EG(fillings) = monthly VOC emissions from filling aerosol cans with VOC propellant

EP(purging) = monthly VOC emissions from purging of lines containing VOC propellant

EG(safety diversions) = monthly VOC emissions from safety diversions of VOC control equipment

ii. For the filling of aerosol cans with VOC propellant and the purging of lines containing VOC propellant, the monthly VOC emissions for filling and line purging shall be calculated as follows:

$$EG(\text{filling}) = \text{monthly sum of } (NC_{p,f,v}) \times (EF_{p,f}) \times (K_p) \times (1 - C_{ep,v}/100) \times (VOC_p)$$

$$EP(\text{purging}) = \text{monthly sum of } (NP_{p,v}) \times (V_p) \times (LD_p) \times (1 - R_p) \times (1 - C_{ep,v}/100) \times (VOC_p)$$

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where:

$CE_{p,v}$ = control efficiency for propellant "p" VOC emissions and type of venting "v" for those emissions, based on venting of VOC propellant emissions to thermal incinerator or not and the overall VOC control efficiency of the thermal incinerator for VOC

$CE_{p,v} = 0\%$ if propellant "p" VOC emissions are not vented to the thermal incinerator

$CE_{p,v}$ = overall VOC control efficiency from most recent compliance test of the thermal incinerator, if propellant "p" VOC emissions are vented to the thermal incinerator (based on 6/30/11 test, $CE_{p,v} = 96.51\%$)

$EF_{p,f}$ = emission factor for VOC propellant gas loss when filling cans with VOC propellant "p", based on propellant filler type "f" (under-the-cup fill, needle fill, or Sepro fill)

$EF_{p,f} = 0.2$ cc/can for needle filling of VOC propellant "p"

$EF_{p,f} = 1.00$ cc/can for Sepro filling of VOC propellant "p"

$EF_{p,f} = 1.75$ cc/can for under-the-cup filling of VOC propellant "p"

K_p = conversion factor for gaseous VOC propellant "p" expressed in lbs/cc at standard conditions

LD_p = liquid density of VOC propellant "p" at storage temperature and pressure, in pounds/gallon

$NC_{p,f,v}$ = number of cans produced with VOC propellant "p" and filling type "f" during the month by type of venting "v" (vented to thermal incinerator or not vented to thermal incinerator)

$NP_{p,v}$ = number of propellant line purges during the month for VOC propellant "p" by type of venting "v" (vented to thermal incinerator or not vented to thermal incinerator)

R_p = fraction by weight of purged VOC propellant "p" which is recovered and stored in a pressure tank

V_p = volume of propellant line purged for VOC propellant "p", in gallons

VOC_p = fraction VOC by weight for VOC propellant "p" (usually 1 for a VOC containing propellant)

iii. Alternative method for filling and line purging

For gasser operations equipped with a thermal incinerator in which the VOC emissions from the filling of aerosol cans with VOC propellant are vented to the thermal incinerator and the line purging of VOC propellant is

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recovered for use as a fuel in the thermal incinerator, the monthly VOC emissions for filling and line purging shall be calculated as follows:

$$EG(\text{filling}) + EG(\text{purging}) = EF * (NC/1000)$$

where:

EF = VOC emissions factor from most recent compliance test of the thermal incinerator, expressed in lbs VOC/1000 aerosol cans produced (based on the 6/30/11 test, EF equals 0.203lb VOC/1000 aerosol cans)

NC = number of aerosol cans produced with VOC propellant during the month

- iv. EG(safety diversions) = the sum of the VOC emissions determined for each safety diversion event that is not an emergency event during the month (see f)(4) for information on safety diversions). The amount of VOC emissions in pounds for a safety diversion event EG(event) shall be calculated as follows:

$$EG(\text{event}) = C_{\text{avg}} * MW * \text{Flow} * \text{Time} * (4.256 \times 10^{-11})$$

where:

C_{avg} = average concentration of VOC propellant in gas stream being vented to ambient air during safety diversion event, in parts per million by volume

MW = molecular weight of VOC propellant being employed in gas house at time of safety diversion event, in pounds per pound-mole

Flow = average flow rate of gas stream being vented to ambient air during safety diversion event, in cubic feet per minute

Time = length of safety diversion event, in seconds

4.256 x 10⁻¹¹ = constant value based on various unit conversions and division by the Universal Gas Constant at standard conditions

[Authority for term: OAC rule 3745-21-09(RR)(6)(c)(i)-(iv)]

- d. VOC emissions from manual aerosol can cleaning operations

For the manual aerosol can cleaning operations (can brushing operations), VOC emissions shall be equal to the mass of VOC solvent consumed in the operation. The monthly VOC emissions from can brushing shall be calculated as the sum of VOC emissions for all solvents consumed during that month. The VOC emissions from each VOC solvent consumed is calculated as the number of VOC solvent gallons consumed during the month times the VOC solvent density (lbs/gal).

[Authority for term: OAC rule 3745-21-09(RR)(6)(d)]

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e. VOC emissions testing

The permittee shall conduct, or have conducted, emissions testing for the thermal incinerator to demonstrate the thermal incinerator's mass emission rate and control efficiency for VOC emissions from this emissions unit's gashouse operations in accordance with the following requirements:

- i. The emissions testing shall be conducted within 36 months after the previous emissions testing.
- ii. The emissions testing shall be conducted to determine the incinerator's mass emission rate and destruction efficiency for volatile organic compounds by means of the test method under OAC rule 3745-21-10(C) with concentration of VOC in the inlet and outlet gas streams determined by utilizing USEPA Method 25 or 25A of 40 CFR Part 60, Appendix A, and
- iii. The emissions testing shall be conducted to determine the VOC capture efficiency of the vapor collection system used to transport VOC emissions from the emissions unit's gashouse operations (propellant filling of aerosol cans and propellant line purging) to the thermal incinerator by means of test methods contained in USEPA Method 204 through 204E of 40 CFR Part 51, Appendix M, or the alternative capture efficiency testing protocols specified in the USEPA, Office of Air Quality Planning and Standards document entitled "Guidelines for Determining Capture Efficiency," dated January 9, 1995.
- iv. The tests shall be conducted while the emissions unit's gashouse is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality.
- v. The overall control efficiency of the thermal incinerator shall be the destruction efficiency times the capture efficiency divided by 100.
- vi. The mass emission rate of the thermal incinerator, expressed in pounds VOC per 1000 aerosol cans produced, shall be the hourly mass emission rate (pounds VOC per hour) divided by the hourly production rate (1000 cans/hour).

For the 6/30/11 compliance test of the thermal incinerator controlling the gashouse operations within emissions units P004 and P005, it was determined that the thermal incinerator emitted 0.203 lb VOC/1000 aerosol cans produced, demonstrated an overall control efficiency of 96.51% (destruction efficiency of 96.51% and capture efficiency of 100%), and showed a monitored combustion temperature average of 1538 degrees Fahrenheit. The 6/30/11 compliance test comprised of six 1-hour runs for emissions units P004 and P005 that operated at a combined production average of 15,182 cans/hr.

[Authority for term: OAC rule 3745-21-09(RR)(7)(a)-(h)]

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- (3) For any emissions testing conducted under f)(1) and f)(2), the permittee shall meet the following requirements:
- a. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland Division of Air Quality (DAQ). 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 Cleveland DAQ's refusal to accept the results of the emission test(s).
 - b. Personnel from the Cleveland DAQ 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.
 - c. 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 Cleveland DAQ within 30 days following completion of the test(s).

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

- (4) Safety diversion events and emergency events for gasser operations being vented to a thermal incinerator.
- a. A safety diversion is the venting of gasser operations directly to ambient air, instead of being vented to the thermal incinerator, in order to meet requirements of National Fire Protection Association (NFPA) 30B, code for the manufacture and storage of aerosol products. A safety diversion occurs when, as described in NFPA 30B, the ventilation rate of the affected gashouse line is quickly increased, the gashouse line is vented immediately to ambient air (i.e., thermal incinerator is bypassed), and production activities usually continue unless there is a production shutdown due to an emergency event. Safety diversion events shall be included in the determination of compliance with the monthly VOC emission limitation of 0.75 lb VOC/1000 aerosol cans produced. The permittee shall maintain a list of criteria for safety diversions that are not emergency events and safety diversions that are emergency events.
 - b. The VOC emissions for a safety diversion event shall be calculated based on the average concentration of the LEL detectors associated with the gashouse line, the flow rate of the gashouse line (measured with a mass flow meter), the propellant being filled, and the length of the event (seconds).
 - c. The permittee shall calibrate the LEL detectors once per month following the manufacturer's protocol and shall check the flow meters once every six months for accuracy using a pitot tube.
 - d. For the next compliance testing of the thermal incinerator, the permittee shall conduct testing and evaluation of the accuracy of the mass flow meters. The

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permittee shall submit a report on such testing and evaluation at the time of the submittal of the thermal incinerator compliance test.

[Authority for term: OAC rule 3745-21-09(RR)(8)(a), (c), (d)]

g) Miscellaneous Requirements

(1) None.

2. P005, Line # 7

Operations, Property and/or Equipment Description:

Aerosol filling line (liquid mixing, liquid filling of aerosol cans, propellant filling of aerosol cans by under-the-cup fill, propellant line purging, and manual cleaning of filled aerosol cans) with the gashouse operations (propellant filling and propellant line purging) controlled by a thermal incinerator.

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 13-3186 issued 2/26/97 and modified 4/30/97	The requirements of this rule includes compliance with OAC rule 3745- 21-09(RR)
b.	OAC rule 3745-21-09(RR)	See b)(2)a. below.
c.	OAC rule 3745-17-07(A)	During the loading of solid material into a liquid mixing tank, visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(1)	During the loading of solid material into a liquid mixing tank, particulate emissions shall not exceed 0.551 pounds/hour (based on Table 1).
e.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See c)(2), d)(1), d)(2), d)(11), e)(2), and f)(4) below.

(2) Additional Terms and Conditions

a. For the liquid mixing tanks, can liquid filling operations, gasser (gashouse) operations (can propellant filling operations and propellant line purging operations), and can brushing operations (manual can cleaning operations) at this facility, the total VOC emissions in any rolling, 12-month period shall not exceed 0.75 pound of VOC per 1000 aerosol cans produced.

c) Operational Restrictions

- (1) Whenever the gashouse production line is in VOC operation, the emissions from the gashouse production line, except during a safety diversion or emergency described under f)(4), shall be vented to the thermal incinerator that is designed and operated with a destruction efficiency greater than or equal to 90% by weight for VOC. A gashouse production line is in VOC operation when either the propellant being used to fill the aerosol cans contains VOC or the propellant being purged from the propellant line contains VOC. The VOC propellant being purged shall be recovered and stored in a fuel tank of the thermal incinerator.

[Authority for term: OAC rule 3745-21-09(RR)(2)]

- (2) The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit's gashouse is vented to the thermal incinerator, shall not be more than 50 degrees Fahrenheit below the average combustion temperature during the most recent emissions test during which the destruction efficiency and mass emission rate of the thermal incinerator were determined as specified under f)(2)e., and the test results showed compliance with the VOC emissions limit for this emissions unit as specified under f)(1).

[Authority for term: OAC rule 3745-21-09(RR)(3) and 40 CFR Part 64]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall operate and maintain the following continuous monitoring devices:
 - a. a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal incinerator. The temperature monitor shall have a minimum accuracy of plus or minus one per cent of the temperature being monitored expressed in degrees Fahrenheit or plus or minus one degree Fahrenheit, whichever is greater. The temperature monitor and recorder shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the owner or operator.
 - b. a lower explosive limit (LEL) monitoring system that continuously measures and records the concentration of VOC and percent LEL within each gashouse line and the inlet vent to the thermal incinerator. The LEL detectors shall have a minimum accuracy of plus or minus two per cent. The LEL detectors shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations. The owner or operator shall calibrate the LEL detectors once per month following the manufacturer's protocol and shall record the date and results of each calibration.
 - c. a mass flow meter that continuously measures and records the flow rate within each gashouse line. The mass flow meters shall have a minimum accuracy of plus or minus 1.5 per cent. The mass flow meters shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations. The owner or operator shall check the mass flow meters once every six months for

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accuracy using a pilot tube and shall record the date and results of each accuracy check.

[Authority for term: OAC rule 3745-21-09(RR)(4)(a)(i)-(iii) and 40 CFR Part 64]

- (2) The permittee shall collect and record the following information for each day of gashouse operation:
- a. a log of operating time for each of the following: gashouse production line ventilation to the thermal incinerator, gashouse production line ventilation directly to ambient air, thermal incinerator operation, temperature monitoring equipment operation, gashouse production line in VOC operation, and gashouse production line not in VOC operation;
 - b. a log of all three-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit's gashouse is in VOC operation, was more than fifty degrees Fahrenheit below the average combustion temperature during the most recent emissions test during which the destruction efficiency of the thermal incinerator was determined under f)(2)e. and the test results showed compliance with the VOC emissions limit for this emissions unit as specified in f)(1); and
 - c. a log of the dates and times of the bypass venting of gashouse emissions to ambient air (see safety diversions under f)(4)) and any downtime for the thermal incinerator and temperature monitoring equipment, when the emissions unit's gashouse is in VOC operation.

[Authority for term: OAC rule 3745-21-09(RR)(4)(b)(i)-(iii) and 40 CFR Part 64]

- (3) The permittee shall collect and record for this emissions unit the number of aerosol cans produced each day and maintain that information at the facility.

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

- (4) The permittee shall collect and record for each aerosol can production line at this facility the following production information each month:
- a. number of aerosol cans produced (sum of daily d)(3) data);
 - b. name and amount (in pounds) of each VOC liquid charged to the mixing tanks and filled into aerosol cans;
 - c. number of aerosol cans filled with a VOC propellant by name of propellant, type of propellant filler (under-the-cup fill, needle fill, or Sepro fill), and type of emissions venting (vented to thermal incinerator or not vented to thermal incinerator);
 - d. number of VOC propellant line purges by name of propellant, type of recovery (recovered for fuel tank of thermal incinerator or not recovered), and type of emissions venting (vented to thermal incinerator or not vented to thermal incinerator);

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- e. name and amount (pounds) of each VOC liquid (solvent) used in the manual aerosol can cleaning operation (can brushing operation); and
- f. the number of safety diversion events and number of safety diversions events that are not emergency events (see safety diversions under f)(4))

[Authority for term: OAC rule 3745-21-09(RR)(4)(c)(i)-(iv)]

- (5) The permittee shall collect and record for this emissions unit the following chemical and physical properties for the VOC liquids and VOC propellants used in this emissions unit:
 - a. for any VOC liquid used in liquid mixing and liquid filling of aerosol cans, the liquid name, the liquid density (lbs/gal), and the vapor pressure (mmHg) at seventy degrees Fahrenheit and eighty degrees Fahrenheit;
 - b. for any VOC liquid used in manual aerosol can cleaning, the liquid name and the liquid density (lbs/gal); and
 - c. for any VOC propellant, the liquid density (lbs/gal) under usual propellant storage temperature and pressure, the vapor density (lbs/cc) at propellant filler temperature, the fraction VOC by weight, the molecular weight, and the lower explosive limit (LEL) concentration (ppmv).

[Authority for term: OAC rule 3745-21-09(RR)(4)(d)(i)-(iii)]

- (6) The permittee shall calculate and record for each month the following information for this emissions unit:
 - a. monthly amount of VOC emissions (pounds) from the liquid mixing operations, in accordance with f)(2)a.;
 - b. monthly amount of VOC emissions (pounds) from the can liquid filling operations, in accordance with f)(2)b.;
 - c. monthly amount of VOC emissions (pounds) from the gashouse operations (propellant filling, propellant line purging, and safety diversions), in accordance with f)(2)c.;
 - d. monthly amount of VOC emissions (pounds) from the manual aerosol can cleaning operations (can brushing operations), in accordance with f)(2)d.;
 - e. monthly number of aerosol cans produced (sum of daily d)(3) data); and
 - f. monthly amount of VOC emissions (pounds) from this emissions unit which is the sum of data recorded under d)(6)a. through d)(6)d.

[Authority for term: OAC rule 3745-21-09(RR)(4)(e)(i)-(v)]

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- (7) The permittee shall calculate and record for each month the following information for emissions units P004 and P005:
- a. monthly amount of VOC emissions (pounds), which is the sum of the monthly VOC emissions recorded under d)(6)f. for emissions units P004 and P005;
 - b. monthly amount of aerosol cans produced, which is a sum of the monthly aerosol can production recorded under d)(6)e. for emissions units P004 and P005;
 - c. monthly VOC emissions rate in pound/1000 cans, which is 1000 times the value from d)(7)a. divided by the value from d)(7)b. and rounded to two decimal places;
 - d. amount of VOC emissions (pounds) during the rolling 12-month period, which is the sum of values recorded under d)(7)a. for this month and the previous 11 consecutive months;
 - e. number of aerosol cans produced during the rolling 12-month period, which is the sum of the values recorded under d)(7)b. for this month and the previous 11 consecutive months.
 - f. VOC emissions rate during the rolling 12-month period in pound/1000 cans, which is 1000 times the value from d)(7)d. divided by the value from d)(7)e., and rounded to two decimal places.

[Authority for term: OAC rule 3745-21-09(RR)(4)(g)(i)-(v)]

- (8) The permittee shall collect and record for P004 and P005, the following information for each safety diversion event, as described in f)(4).
- a. 20% LEL stamp, which indicates that a concentration between 20% and 40% of the LEL occurred;
 - b. date and time of the 20% LEL stamp;
 - c. event length (seconds);
 - d. type of VOC propellant being employed in the gashouse;
 - e. average concentration of LEL detectors in gashouse line (ppmv);
 - f. average flow rate (cfm); and
 - g. amount of VOC emissions (pounds).

[Authority for term: OAC rule 3745-21-09(RR)(4)(h)(i)-(vii)]

- (9) Visible Emissions from Mixing Tanks

- a. The permittee shall perform weekly checks, when solid materials are added to the mixing tanks of this emissions unit and when the weather conditions allow, for any visible particulate emissions from the stack(s) serving the mixing tanks. The presence or absence of any visible emissions shall be noted in an operations log.

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If visible emissions are observed, the permittee shall also note the following in the operations log:

- i. the color of the emissions;
 - ii. whether the emissions are representative of normal operations;
 - iii. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - iv. the total duration of any visible emissions incident; and
 - v. any corrective actions taken to eliminate the visible emissions.
- b. In the event of two consecutive quarters in which no visible emissions are observed under d)(9)a. for all mixing tanks of this emissions unit, the permittee can elect to perform checks for visible emissions on a monthly basis in the manner described under d)(9)a. If visible emissions are subsequently observed during any month, the permittee shall immediately go back to checks for visible emissions during each week as described under d)(9)a. and the permittee may again elect to use the provisions under this section.

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

- (10) The records required in d) shall be maintained for a minimum of five years and shall be available for review by the director or any authorized representative of the director during normal business hours.

[Authority for term: OAC rule 3745-77-07(C) and OAC rule 3745-21-09(RR)(4)(i)]

- (11) The CAM plan for this emissions unit has been developed for VOC emissions. The CAM performance indicator for VOC emissions is the record keeping program for the emissions unit and its control equipment.

The CAM performance indicator device to continuously monitor the combustion temperature of the thermal incinerator when the emissions unit is in operation is specified in c)(2). When the monitoring requirements are outside of any parameters specified in c)(2) and d)(1), corrective action (including, but not limited to, an evaluation of the emissions unit and the control device) will be required.

Upon detecting an excursion of any of the VOC emission indicator parameters listed above, the owner or operator shall restore operation of the emissions unit (including the control devices) to its normal or usual manner of operation as expeditiously as practical 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, or any necessary follow-up actions to return operation to within the indicator range.

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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 64.8.

[Authority for term: OAC rule 37-45-77-07(C)(1) and 40 CFR Part 64]

e) Reporting Requirements

- (1) 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

[Authority for term: OAC rule 3745-15-03(A)]

- (2) The permittee shall submit quarterly compliance status reports:

- a. that identify any emission rate violation in which the emission rate recorded under d)(7)f. exceeds the VOC emission limitation specified in b)(2)a.;
- b. that identify any deviations of the requirements specified in c)(1) and c)(2) as recorded in d)(2)b. and d)(2)c.;and
- c. that provide summaries of records required in d)(1) through d)(8).

These quarterly compliance status reports shall be submitted by April 30, July 31, October 31, and January 31 and shall cover the records for the previous calendar quarters.

[Authority for term: OAC rule 3745-21-09(RR)(5)(a)(i)-(ii), (5)(b)]

- (3) The permittee shall submit quarterly written reports that identify:

- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

These quarterly compliance status reports shall be submitted by April 30, July 31, October 31, and January 31 and shall cover the records for the previous calendar quarters.

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

f) Testing Requirements

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

a. Emission Limitation:

For the liquid mixing tanks, can liquid filling operations, gasser operations, and can brushing operations at this facility, the total VOC emissions in any rolling 12-month period shall not exceed 0.75 pound of VOC per 1000 aerosol cans produced.

Applicable compliance method:

Compliance shall be demonstrated by means of:

- i. recordkeeping specified in d)(4), d)(5), d)(6), and d)(7) of the terms and conditions of emissions units P004 and P005;
- ii. calculating the VOC emissions rate for the mixing tanks (mixing operations), can liquid filling operations, gasser operations (gashouse operations), and can brushing operations (manual can cleaning) at this facility, as specified in f)(2)a. of the terms and conditions of emissions units P004 and P005;
- iii. testing the thermal incinerator, as specified in f)(2)e. of the terms and conditions of emissions units P004 and P005; and
- iv. operating and maintaining a continuous temperature monitor and recorder for the thermal incinerator and maintaining a log of gashouse operations, as specified in d)(1) and d)(2) of the terms and conditions of emissions units P004 and P005.

In the event additional emissions testing is required to demonstrate compliance, the VOC emissions shall be determined in accordance with US EPA 40 CFR, Part 60, Method 25.

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

b. Emission Limitation:

During the loading of solid material into a liquid mixing tank, particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

The liquid mixing tanks for this emissions unit are similar to the mixing tanks at paint manufacturing facilities in which the particulate emissions are estimated to be 0.5 to 1.0 percent of the pigment handled, based on USEPA reference document AP-42: Compilation of Air Pollutant Emissions Factors, Fifth Edition (Table 6.4-1 which has a "C" emission factor rating). This facility infrequently adds some pigment to the liquid mixing tanks, and such infrequent and low usage of pigment would not normally cause particulate emissions to exceed this emission limitation. Compliance with the visible particulate emissions limitation under f)(1)c. provides further assurance of compliance of this emissions limitation.

In the event testing is required to demonstrate compliance, the particulate emissions shall be determined by USEPA Method 5, 40CFR 60, Appendix A.

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

c. Emission Limitation:

During the loading of solid material into a liquid mixing tank, visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be demonstrated by the recordkeeping in d)(9) and reporting in e)(3).

In the event additional emissions testing is required to demonstrate compliance, the visible emissions shall be determined in accordance with 40 CFR, Part 60, Appendix A, Method 9.

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

(2) The VOC emissions calculations for this facility were taken in part from the permittee's Air Pollution Emission Model. The VOC emissions from this emissions unit shall be calculated as follows:

a. For liquid mixing operations, the monthly VOC emissions (pounds), E(mixing), shall be calculated as follows:

i. $E(\text{mixing}) = E_i(\text{loading}) + E_i(\text{venting})$

where:

$E(\text{loading})$ = monthly VOC emissions from loading VOC liquids into mixing tanks

$E(\text{venting})$ = monthly VOC emissions from venting VOC liquids during mixing

ii. For loading VOC liquid into a mixing tank, the monthly VOC emissions shall be calculated, based on the ideal gas law and displacement of saturated vapors at 70 degrees Fahrenheit (21 degrees Celsius), as follows:

$E(\text{loading})$ = monthly sum of $E_i(\text{loading})$ for all VOC liquid "i" loaded into mixing tanks

$E_i(\text{loading}) = (P_i * X_i * V_i * MW_i) / (R * T)$

where:

$E_i(\text{loading})$ = pounds of VOC emissions during the month from loading VOC liquid "i" into mixing tanks

P_i = vapor pressure of VOC liquid "i" at 70 degrees Fahrenheit, in mmHg

X_i = mole fraction of VOC liquid "i" in liquid mix (value of one is used for this emissions estimate)

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V_i = volume of VOC liquid "i" charged to mixing tanks during the month in cubic feet (equals monthly gallons of liquid "i" divided by 7.48 gallons per cubic foot)

R = 999 mmHg-cubic feet/lb mole-degrees Kelvin

T = temperature in degrees Kelvin (which equals degrees Celsius plus two hundred seventy-three), so 70°F = 21°C = 294°K

MW_i = molecular weight of VOC liquid "i", in lbs/lb mole

- iii. For venting of VOC liquids during mixing, the monthly VOC emissions shall be calculated, based on the ideal gas law and venting of saturated vapors at 80 degrees Fahrenheit (27 degrees Celsius), as follows:

$E(\text{venting})$ = monthly sum of $E_i(\text{venting})$ for all VOC liquid "i" loaded into mixing tanks

$$E_i(\text{venting}) = (P_i * X_i * V_{i,v} * MW_i) / (R * T)$$

where:

$E_i(\text{venting})$ = pounds of VOC emissions during the month for venting a VOC liquid "i" during mixing

P_i = vapor pressure of VOC liquid "i" at 80 degrees Fahrenheit, in mmHg

X_i = mole fraction of VOC liquid "i" in liquid mix (a value of 1 is used for this emissions estimate)

$V_{i,v}$ = volume (cubic feet) of saturated vapors removed by the ventilation system during mixing of VOC liquid "i" (equals monthly gallons of VOC liquid "i" times 5*30/350 based on 5% of the total ventilation flow rate or 5 cubic ft/min, an average mixing time of 30 min/batch, and a typical batch size of 350 gallons)

R = 999 mmHg-cubic feet/lb mole-degrees Kelvin

T = temperature in degrees Kelvin (which equals degrees Celsius plus two hundred seventy-three), so 80°F = 27°C = 300°K

MW_i = molecular weight of VOC liquid "i", in lbs/lb mole

- iv. Alternative method to f)(2)a.i. through f)(2)a.iii.

An alternative method for calculating the monthly emissions rate for liquid mixing operations shall be as follows:

$$E(\text{mixing}) = EFM * V(\text{mixing})$$

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where:

EFM = emission factor of 0.00131 lb VOC/lb VOC liquid throughput (this emission factor is based on the highest annual average emission factor for mixing operations during 1997 to 2000)

V(mixing) = monthly throughput of VOC liquid employed for mixing, in pounds

- v. If for any month in which the use of the alternative method shows noncompliance with the VOC emissions limit, the method described in f)(2)a.i. through f)(2)a.iii. shall be used to calculate monthly emissions. The compliance determination will then be based on these more detailed calculations.

[Authority for term: OAC rule 3745-21-09(RR)(6)(a)(i)-(v)]

- b. VOC emissions from liquid filling of aerosol cans.

- i. For the liquid filling of aerosol cans, the monthly VOC emissions (pounds) shall be calculated, based on the ideal gas law and displacement of saturated vapors at 70 degrees Fahrenheit (21 degrees Celsius) as follows:

E(filling) = monthly sum of $E_i(\text{filling})$ for all VOC liquid "i" filling of aerosol cans

$$E_i(\text{filling}) = (P_i * X_i * V_i * MW_i) / (R * T)$$

where:

$E_i(\text{filling})$ = pounds of VOC emissions during the month for VOC liquid "i" filling of aerosol cans

P_i = vapor pressure of VOC liquid "i" at 70 degrees Fahrenheit, in mmHg

X_i = mole fraction of VOC liquid "i" in liquid fill (a value of 1 is used for this emissions estimate)

V_i = volume of VOC liquid "i" filled into aerosol cans during the month in cubic feet (equals monthly gallons of VOC liquid "i" divided by 7.48 gal/cu ft)

R = 999 mmHg-cubic ft/lb mole-degrees Kelvin

T = temperature in degrees Kelvin (which equals degrees Celsius plus two hundred seventy-three), so 70°F = 21°C = 294°K

MW_i = molecular weight of VOC liquid "i", in lbs/lb mole

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ii. Alternative method to f)(2)b.i.

An alternative method for calculating the monthly emissions for liquid can filling operations shall be as follows:

$$E(\text{filling}) = \text{EFF} * V(\text{filling})$$

where:

EFF = emission factor of 0.00026 lb VOC/lb VOC liquid throughput (this emission factor is based on the highest annual average emission factor for liquid can filling operations during 1997 to 2000)

V(fillling) = monthly throughput of VOC liquid employed for can filling, in pounds

iii. If for any month in which the use of this alternative method shows noncompliance with the VOC emission limit, the method described in f)(2)b.i. shall be used to calculate monthly emissions for liquid filling of aerosol cans. The compliance determination will then be based on these more detailed calculations.

[Authority for term: OAC rule 3745-21-09(RR)(6)(b)(i)-(iii)]

c. VOC emissions from gasser (gashouse) operations.

i. For the gasser operations, the monthly VOC emissions in pounds, EG(total), shall be calculated as follows:

$$EG(\text{total}) = EG(\text{filling}) + EG(\text{purging}) + EG(\text{safety diversions})$$

where:

EG(fillling) = monthly VOC emissions from filling aerosol cans with VOC propellant

EP(purging) = monthly VOC emissions from purging of lines containing VOC propellant

EG(safety diversions) = monthly VOC emissions from safety diversions of VOC control equipment

ii. For the filling of aerosol cans with VOC propellant and the purging of lines containing VOC propellant, the monthly VOC emissions for filling and line purging shall be calculated as follows:

$$EG(\text{filling}) = \text{monthly sum of } (NC_{p,f,v}) \times (EF_{p,f}) \times (K_p) \times (1 - C_{ep,v}/100) \times (VOC_p)$$

$$EP(\text{purging}) = \text{monthly sum of } (NP_{p,v}) \times (V_p) \times (LD_p) \times (1 - R_p) \times (1 - C_{ep,v}/100) \times (VOC_p)$$

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where:

$CE_{p,v}$ = control efficiency for propellant "p" VOC emissions and type of venting "v" for those emissions, based on venting of VOC propellant emissions to thermal incinerator or not and the overall VOC control efficiency of the thermal incinerator for VOC

$CE_{p,v} = 0\%$ if propellant "p" VOC emissions are not vented to the thermal incinerator

$CE_{p,v}$ = overall VOC control efficiency from most recent compliance test of the thermal incinerator, if propellant "p" VOC emissions are vented to the thermal incinerator (based on 6/30/11 test, $CE_{p,v} = 96.51\%$)

$EF_{p,f}$ = emission factor for VOC propellant gas loss when filling cans with VOC propellant "p", based on propellant filler type "f" (under-the cup fill, needle fill, or Sepro fill)

$EF_{p,f} = 0.2$ cc/can for needle filling of VOC propellant "p"

$EF_{p,f} = 1.00$ cc/can for Sepro filling of VOC propellant "p"

$EF_{p,f} = 1.75$ cc/can for under-the-cup filling of VOC propellant "p"

K_p = conversion factor for gaseous VOC propellant "p" expressed in lbs/cc at standard conditions

LD_p = liquid density of VOC propellant "p" at storage temperature and pressure, in pounds/gallon

$NC_{p,f,v}$ = number of cans produced with VOC propellant "p" and filling type "f" during the month by type of venting "v" (vented to thermal incinerator or not vented to thermal incinerator)

$NP_{p,v}$ = number of propellant line purges during the month for VOC propellant "p" by type of venting "v" (vented to thermal incinerator or not vented to thermal incinerator)

R_p = fraction by weight of purged VOC propellant "p" which is recovered and stored in a pressure tank

V_p = volume of propellant line purged for VOC propellant "p", in gallons

VOC_p = fraction VOC by weight for VOC propellant "p" (usually 1 for a VOC containing propellant)

iii. Alternative method for filling and line purging

For gasser operations equipped with a thermal incinerator in which the VOC emissions from the filling of aerosol cans with VOC propellant are vented to the thermal incinerator and the line purging of VOC propellant is

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recovered for use as a fuel in the thermal incinerator, the monthly VOC emissions for filling and line purging shall be calculated as follows:

$$EG(\text{filling}) + EG(\text{purging}) = EF * (NC/1000)$$

where:

EF = VOC emissions factor from most recent compliance test of the thermal incinerator, expressed in lbs VOC/1000 aerosol cans produced (based on the 6/30/11 test, EF equals 0.203 lb VOC/1000 aerosol cans)

NC = number of aerosol cans produced with VOC propellant during the month

- iv. EG(safety diversions) = the sum of the VOC emissions determined for each safety diversion event that is not an emergency event during the month (see f)(4) for information on safety diversions). The amount of VOC emissions in pounds for a safety diversion event EG(event) shall be calculated as follows:

$$EG(\text{event}) = C_{\text{avg}} * MW * \text{Flow} * \text{Time} * (4.256 \times 10^{-11})$$

where:

C_{avg} = average concentration of VOC propellant in gas stream being vented to ambient air during safety diversion event, in parts per million by volume

MW = molecular weight of VOC propellant being employed in gashouse at time of safety diversion event, in pounds per pound-mole

Flow = average flow rate of gas stream being vented to ambient air during safety diversion event, in cubic feet per minute

Time = length of safety diversion event, in seconds

4.256 x 10⁻¹¹ = constant value based on various unit conversions and division by the Universal Gas Constant at standard conditions

[Authority for term: OAC rule 3745-21-09(RR)(6)(c)(i)-(iv)]

- d. VOC emissions from manual aerosol can cleaning operations

For the manual aerosol can cleaning operations (can brushing operations), VOC emissions shall be equal to the mass of VOC solvent consumed in the operation. The monthly VOC emissions from can brushing shall be calculated as the sum of VOC emissions for all solvents consumed during that month. The VOC emissions from each VOC solvent consumed is calculated as the number of VOC solvent gallons consumed during the month times the VOC solvent density (lbs/gal).

[Authority for term: OAC rule 3745-21-09(RR)(6)(d)]

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e. VOC emissions testing

The permittee shall conduct, or have conducted, emissions testing for the thermal incinerator to demonstrate the thermal incinerator's mass emission rate and control efficiency for VOC emissions from this emissions unit's gashouse operations in accordance with the following requirements:

- i. The emissions testing shall be conducted within 36 months after the previous emissions testing.
- ii. The emissions testing shall be conducted to determine the incinerator's mass emission rate and destruction efficiency for volatile organic compounds by means of the test method under OAC rule 3745-21-10(C) with concentration of VOC in the inlet and outlet gas streams determined by utilizing USEPA Method 25 or 25A of 40 CFR Part 60, Appendix A, and
- iii. The emissions testing shall be conducted to determine the VOC capture efficiency of the vapor collection system used to transport VOC emissions from the emissions unit's gashouse operations (propellant filling of aerosol cans and propellant line purging) to the thermal incinerator by means of test methods contained in USEPA Method 204 through 204E of 40 CFR Part 51, Appendix M, or the alternative capture efficiency testing protocols specified in the USEPA, Office of Air Quality Planning and Standards document entitled "Guidelines for Determining Capture Efficiency," dated January 9, 1995.
- iv. The tests shall be conducted while the emissions unit's gashouse is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland Division of Air Quality.
- v. The overall control efficiency of the thermal incinerator shall be the destruction efficiency times the capture efficiency divided by 100.
- vi. The mass emission rate of the thermal incinerator, expressed in pounds VOC per 1000 aerosol cans produced, shall be the hourly mass emission rate (pounds VOC per hour) divided by the hourly production rate (1000 cans/hour).

For the 6/30/11 compliance test of the thermal incinerator controlling the gashouse operations within emissions units P004 and P005, it was determined that the thermal incinerator emitted 0.203 lb VOC/1000 aerosol cans produced, demonstrated an overall control efficiency of 96.51% (destruction efficiency of 96.51% and capture efficiency of 100%), and showed a monitored combustion temperature average of 1538 degrees Fahrenheit. The 6/30/11 compliance test comprised of six 1-hour runs for emissions units P004 and P005 that operated at a combined production average of 15,182 cans/hr.

[Authority for term: OAC rule 3745-21-09(RR)(7)(a)-(h)]

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- (3) For any emissions testing conducted under f)(1) and f)(2), the permittee shall meet the following requirements:
- a. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland Division of Air Quality (DAQ). 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 Cleveland DAQ's refusal to accept the results of the emission test(s).
 - b. Personnel from the Cleveland DAQ 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.
 - c. 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 Cleveland DAQ within 30 days following completion of the test(s).

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

- (4) Safety diversion events and emergency events for gasser operations being vented to a thermal incinerator.
- a. A safety diversion is the venting of gasser operations directly to ambient air, instead of being vented to the thermal incinerator, in order to meet requirements of National Fire Protection Association (NFPA) 30B, code for the manufacture and storage of aerosol products. A safety diversion occurs when, as described in NFPA 30B, the ventilation rate of the affected gashouse line is quickly increased, the gashouse line is vented immediately to ambient air (i.e., thermal incinerator is bypassed), and production activities usually continue unless there is a production shutdown due to an emergency event. Safety diversion events shall be included in the determination of compliance with the monthly VOC emission limitation of 0.75 lb VOC/1000 aerosol cans produced. The permittee shall maintain a list of criteria for safety diversions that are not emergency events and safety diversions that are emergency events.
 - b. The VOC emissions for a safety diversion event shall be calculated based on the average concentration of the LEL detectors associated with the gashouse line, the flow rate of the gashouse line (measured with a mass flow meter), the propellant being filled, and the length of the event (seconds).
 - c. The permittee shall calibrate the LEL detectors once per month following the manufacturer's protocol and shall check the flow meters once every six months for accuracy using a pitot tube.
 - d. For the next compliance testing of the thermal incinerator, the permittee shall conduct testing and evaluation of the accuracy of the mass flow meters. The

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permittee shall submit a report on such testing and evaluation at the time of the submittal of the thermal incinerator compliance test.

[Authority for term: OAC rule 3745-21-09(RR)(8)(a), (c), (d)]

g) Miscellaneous Requirements

(1) None.