



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
ALLEN COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 03-17142

Fac ID: 0302020345

DATE: 8/1/2006

Organic Coating Production
Cliff Falls
1501 W. Michigan Street
Sidney, OH 45365

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

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

Sincerely,

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

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/1/2006
Effective Date: 8/1/2006**

FINAL PERMIT TO INSTALL 03-17142

Application Number: 03-17142
Facility ID: 0302020345
Permit Fee: **\$1800**
Name of Facility: Organic Coating Production
Person to Contact: Cliff Falls
Address: 1501 W. Michigan Street
Sidney, OH 45365

Location of proposed air contaminant source(s) [emissions unit(s)]:
**999 West Grand Avenue
Lima, Ohio**

Description of proposed emissions unit(s):
Installation of ink manufacturing operations.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

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Issued: 8/1/2006

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Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	75.86

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

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

Operations, Property, and/or Equipment - (P001) - Hackmayer 2hp mixer (Mixer 2)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	0.66 lb organic compounds (OC) per hour and 2.89 tons OC per year
OAC rule 3745-21-07(G)(2)	None (see A.2.a)

2. Additional Terms and Conditions

- 2.a OAC Rule 3745-21-07 (G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).
- 2.b The short-term (lb/hour) and long-term (tons/year) emission limitations for OC from this emissions unit were established based on potential to emit; therefore, no record keeping and/or reporting requirements are needed for these emissions limitations.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

None

D. Reporting Requirements

None

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E. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
0.66 pounds OC/hour

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with Methods 1 - 4 and 18, 25 or 25A, as applicable, of 40 CFR Part 60, Appendix A.

*The hourly potential to emit is based on a "worst case" operating scenario involving a maximum emission rate of 0.66 lb OC/batch and a batch time of one hour. The lb/batch emission rate was determined from Emission Inventory Improvement Program (STAPPA, ALAPCO, EPA), Volume 2, Chapter 8 - Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities (February 2005)

- b. Emission Limitation:
2.89 tons OC/year

Applicable Compliance Method:

The annual OC emission limitation is based on the emission unit's potential to emit*. Therefore, no annual record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum of 8760 batches per year multiplied by a maximum emission factor of 0.66 pounds OC/batch mixed.

F. Miscellaneous Requirements

1. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified

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permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the amount or composition of the materials, or use of new materials, that would cause the maximum potential emissions to increase above permit allowable limits, may require the permittee to apply for and obtain a new permit to install.

2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary for this emissions unit. Modeling was not necessary because the emission rate for each toxic compound emitted by this emissions unit combined with the emission rate of the same individual toxic compound emitted from other emission units, contained in this permit to install, will not exceed 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P002) - Hackmayer 2hp mixer (Mixer 3)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	0.66 lb organic compounds (OC) per hour and 2.89 tons OC per year
OAC rule 3745-21-07(G)(2)	See A.2.a

2. Additional Terms and Conditions

- 2.a OAC Rule 3745-21-07 (G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).
- 2.b The short-term (lb/hour) and long-term (tons/year) emission limitations for OC from this emissions unit were established based on potential to emit; therefore, no record keeping and/or reporting requirements are needed for these emissions limitations.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

None

D. Reporting Requirements

None

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E. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
0.66 pounds OC/hour

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with Methods 1 - 4 and 18, 25 or 25A, as applicable, of 40 CFR Part 60, Appendix A.

*The hourly potential to emit is based on a "worst case" operating scenario involving a maximum emission rate of 0.66 lb OC/batch and a batch time of one hour. The lb/batch emission rate was determined from Emission Inventory Improvement Program (STAPPA, ALAPCO, EPA), Volume 2, Chapter 8 - Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities (February 2005)

- b. Emission Limitation:
2.89 tons OC/year

Applicable Compliance Method:

The annual OC emission limitation is based on the emission unit's potential to emit*. Therefore, no annual record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum of 8760 batches per year multiplied by a maximum emission factor of 0.66 pounds OC/batch mixed.

F. Miscellaneous Requirements

1. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified

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permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the amount or composition of the materials, or use of new materials, that would cause the maximum potential emissions to increase above permit allowable limits, may require the permittee to apply for and obtain a new permit to install.

2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary for this emissions unit. Modeling was not necessary because the emission rate for each toxic compound emitted by this emissions unit combined with the emission rate of the same individual toxic compound emitted from other emission units, contained in this permit to install, will not exceed 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P003) - Schold 10hp Mixer (Mixer 1)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	2.51 lb organic compounds (OC) per hour and 9.62 tons OC per year
OAC rule 3745-21-07(G)(2)	See A.2.a

2. Additional Terms and Conditions

- 2.a OAC Rule 3745-21-07 (G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).
- 2.b The short-term (lb/hour)and long-term (tons/year) emission limitations for OC from this emissions unit were established based on potential to emit; therefore, no record keeping and/or reporting requirements are needed for these emissions limitations.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions unit P003, P004, P005 and P801 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the

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SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene
TLV (mg/m³): 188.40
Maximum Hourly Emission Rate (lbs/hr): 7.08
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2484.9
MAGLC (ug/m³): 4485.7

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or clean-up materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under

Emissions Unit ID: **P003**

other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

None

E. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
2.51 pounds OC/hour

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with Methods 1 - 4 and 18, 25 or 25A, as applicable, of 40 CFR Part 60, Appendix A.

*The hourly potential to emit is based on a "worst case" operating scenario involving a maximum emission rate of 8.78 lbs OC/batch and a batch time of 3.5 hours. The lb/batch emission rate was determined from Emission Inventory Improvement Program (STAPPA, ALAPCO, EPA), Volume 2, Chapter 8 -

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Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities (February 2005)

- b. Emission Limitation:
9.62 tons OC/year

Applicable Compliance Method:

The annual OC emission limitation is based on the emission unit's potential to emit*. Therefore, no annual record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum of 2191 batches per year multiplied by a maximum emission factor of 8.78 pounds OC/batch mixed.

F. Miscellaneous Requirements

1. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the amount or composition of the materials, or use of new materials, that would cause the maximum potential emissions to increase above permit allowable limits, may require the permittee to apply for and obtain a new permit to install.

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

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

Operations, Property, and/or Equipment - (P004) - Schold 10hp Mixer (Mixer 4)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	2.51 lb organic compounds (OC) per hour and 9.62 tons OC per year
OAC rule 3745-21-07(G)(2)	See A.2.a

2. Additional Terms and Conditions

- 2.a OAC Rule 3745-21-07 (G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).
- 2.b The short-term (lb/hour) and long-term (tons/year) emission limitations for OC from this emissions unit were established based on potential to emit; therefore, no record keeping and/or reporting requirements are needed for these emissions limitations.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions unit P003, P004, P005 and P801 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit

Emissions Unit ID: **P004**

to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m³): 188.40

Maximum Hourly Emission Rate (lbs/hr): 7.08

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2484.9MAGLC (ug/m³): 4485.7

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or clean-up materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis

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level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

None

E. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
2.51 pounds OC/hour

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with Methods 1 - 4 and 18, 25 or 25A, as applicable, of 40 CFR Part 60, Appendix A.

*The hourly potential to emit is based on a "worst case" operating scenario

Emissions Unit ID: **P004**

involving a maximum emission rate of 8.78 lbs OC/batch and a batch time of 3.5 hours. The lb/batch emission rate was determined from Emission Inventory Improvement Program (STAPPA, ALAPCO, EPA), Volume 2, Chapter 8 - Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities (February 2005)

- b. Emission Limitation:
9.62 tons OC/year

Applicable Compliance Method:

The annual OC emission limitation is based on the emission unit's potential to emit*. Therefore, no annual record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum of 2191 batches per year multiplied by a maximum emission factor of 8.78 pounds OC/batch mixed.

F. Miscellaneous Requirements

1. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the amount or composition of the materials, or use of new materials, that would cause the maximum potential emissions to increase above permit allowable limits, may require the permittee to apply for and obtain a new permit to install.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P005) - Schold 10hp Mixer (Mixer 5)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	2.51 lb organic compounds (OC) per hour and 9.62 tons OC per year
OAC rule 3745-21-07(G)(2)	See A.2.a

2. Additional Terms and Conditions

- 2.a OAC Rule 3745-21-07 (G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).
- 2.b The short-term (lb/hour)and long-term (tons/year) emission limitations for OC from this emissions unit were established based on potential to emit; therefore, no record keeping and/or reporting requirements are needed for these emissions limitations.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions unit P003, P004, P005 and P801 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit

Emissions Unit ID: P005

to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m³): 188.40

Maximum Hourly Emission Rate (lbs/hr): 7.08

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2484.9MAGLC (ug/m³): 4485.7

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or clean-up materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis

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level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

None

E. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
2.51 pounds OC/hour

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with Methods 1 - 4 and 18, 25 or 25A, as applicable, of 40 CFR Part 60, Appendix A.

*The hourly potential to emit is based on a "worst case" operating scenario

Emissions Unit ID: **P005**

involving a maximum emission rate of 8.78 lbs OC/batch and a batch time of 3.5 hours. The lb/batch emission rate was determined from Emission Inventory Improvement Program (STAPPA, ALAPCO, EPA), Volume 2, Chapter 8 - Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities (February 2005)

- b. Emission Limitation:
9.62 tons OC/year

Applicable Compliance Method:

The annual OC emission limitation is based on the emission unit's potential to emit*. Therefore, no annual record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum of 2191 batches per year multiplied by a maximum emission factor of 8.78 pounds OC/batch mixed.

F. Miscellaneous Requirements

1. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the amount or composition of the materials, or use of new materials, that would cause the maximum potential emissions to increase above permit allowable limits, may require the permittee to apply for and obtain a new permit to install.

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

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

Operations, Property, and/or Equipment - (P006) - Ross High Temperature Mixer (Mixer 6)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	3.42 lb organic compounds (OC) per hour and 12.16 tons OC per year
OAC rule 3745-21-07(G)(2)	See A.2.a

2. Additional Terms and Conditions

- 2.a OAC Rule 3745-21-07 (G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).
- 2.b The short-term (lb/hour) and long-term (tons/year) emission limitations for OC from this emissions unit were established based on potential to emit; therefore, no record keeping and/or reporting requirements are needed for these emissions limitations.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

None

D. Reporting Requirements

None

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E. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
3.42 pounds OC/hour

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with Methods 1 - 4 and 18, 25 or 25A, as applicable, of 40 CFR Part 60, Appendix A.

*The hourly potential to emit is based on a "worst case" operating scenario involving a maximum emission rate of 22.21 lbs OC/batch and a batch time of 6.5 hours. The lb/batch emission rate was determined from Emission Inventory Improvement Program (STAPPA, ALAPCO, EPA), Volume 2, Chapter 8 - Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities (February 2005)

- b. Emission Limitation:
12.16 tons OC/year

Applicable Compliance Method:

The annual OC emission limitation is based on the emission unit's potential to emit*. Therefore, no annual record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum of 1095 batches per year multiplied by a maximum emission factor of 22.21 pounds

OC/batch mixed.

F. Miscellaneous Requirements

1. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the amount or composition of the materials, or use of new materials, that would cause the maximum potential emissions to increase above permit allowable limits, may require the permittee to apply for and obtain a new permit to install.
2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary for this emissions unit. Modeling was not necessary because the emission rate for each toxic compound emitted by this emissions unit combined with the emission rate of the same individual toxic compound emitted from other emission units, contained in this permit to install, will not exceed 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P007) - Ross Base Coat Mixer (Mixer 7)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	4.56 lb organic compounds (OC) per hour and 17.48 tons OC per year
OAC rule 3745-21-07(G)(2)	See A.2.a

2. Additional Terms and Conditions

- 2.a OAC Rule 3745-21-07 (G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).
- 2.b The short-term (lb/hour) and long-term (tons/year) emission limitations for OC from this emissions unit were established based on potential to emit; therefore, no record keeping and/or reporting requirements are needed for these emissions limitations.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permit to install for emissions unit P007 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application

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and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Isophorone

TLV (mg/m³): 20.86

Maximum Hourly Emission Rate (lbs/hr): 0.837

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 293.8

MAGLC (ug/m³): 496.0

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or clean-up materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis

Emissions Unit ID: **P007**

level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

None

E. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
4.56 pounds OC/hour

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with Methods 1 - 4 and 18, 25 or 25A, as applicable, of 40 CFR Part 60, Appendix A.

*The hourly potential to emit is based on a "worst case" operating scenario involving a maximum emission rate of 31.92 lbs OC/batch and a batch time of 7 hours. The lb/batch emission rate was determined from Emission Inventory

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Improvement Program (STAPPA, ALAPCO, EPA), Volume 2, Chapter 8 - Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities (February 2005)

- b. Emission Limitation:
17.48 tons OC/year

Applicable Compliance Method:

The annual OC emission limitation is based on the emission unit's potential to emit*. Therefore, no annual record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum of 1095 batches per year multiplied by a maximum emission factor of 31.92 pounds OC/batch mixed.

F. Miscellaneous Requirements

1. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the amount or composition of the materials, or use of new materials, that would cause the maximum potential emissions to increase above permit allowable limits, may require the permittee to apply for and obtain a new permit to install.

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

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

Operations, Property, and/or Equipment - (P008) - Ross Tape Mixers (Mixer 8)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	0.98 lb organic compounds (OC) per hour and 4.28 tons OC per year
OAC rule 3745-21-07(G)(2)	See A.2.a

2. Additional Terms and Conditions

- 2.a OAC Rule 3745-21-07 (G)(2) does not apply because the emissions unit is not involved in "employing, applying, evaporating or drying" photochemically reactive material (Ohio Supreme Court's decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).
- 2.b The short-term (lb/hour) and long-term (tons/year) emission limitations for OC from this emissions unit were established based on potential to emit; therefore, no record keeping and/or reporting requirements are needed for these emissions limitations.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

None

D. Reporting Requirements

None

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E. Testing Requirements

1. Compliance Methods Requirements: Compliance with the emission limitations in Section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation:
0.98 pounds OC/hour

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit*. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with Methods 1 - 4 and 18, 25 or 25A, as applicable, of 40 CFR Part 60, Appendix A.

*The hourly potential to emit is based on a "worst case" operating scenario involving a maximum emission rate of 5.86 lbs OC/batch and a batch time of 6 hours. The lb/batch emission rate was determined from Emission Inventory Improvement Program (STAPPA, ALAPCO, EPA), Volume 2, Chapter 8 - Methods for Estimating Air Emissions from Paint, Ink, and Other Coating Manufacturing Facilities (February 2005)

- b. Emission Limitation:
4.28 tons OC/year

Applicable Compliance Method:

The annual OC emission limitation is based on the emission unit's potential to emit*. Therefore, no annual record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit for this emissions unit was based on a maximum of 1460 batches per year multiplied by a maximum emission factor of 5.86 pounds OC/batch mixed.

F. Miscellaneous Requirements

Emissions Unit ID: P008

1. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the amount or composition of the materials, or use of new materials, that would cause the maximum potential emissions to increase above permit allowable limits, may require the permittee to apply for and obtain a new permit to install.

2. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary for this emissions unit. Modeling was not necessary because the emission rate for each toxic compound emitted by this emissions unit combined with the emission rate of the same individual toxic compound emitted from other emission units, contained in this permit to install, will not exceed 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (P801) - Facility Wide Clean-up Operations

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	7.3 tons organic compounds (OC)/year See A.2.a
OAC rule 3745-21-07 (G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day

2. **Additional Terms and Conditions**

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for clean-up material usage for the entire facility (emissions unit P801):
 - a. the company identification for each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the organic compound content of each cleanup material, in pounds per gallon;
 - d. the total organic compound emission rate for all cleanup materials, in pounds per day;

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- e. the total number of hours clean-up operations were performed at the facility; and
 - f. the average hourly organic compound emission rate for all cleanup materials, i.e., (d)/(e), in pounds per hour (average).
2. The permittee shall collect and record the following information for the purpose of determining annual organic compound emissions:
- a. the company identification for each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the organic compound content of each cleanup material, in pounds per gallon; and
 - d. the total organic compound emission rate for all cleanup materials, in pounds.
- 3.. The permit to install for emissions unit P801 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: MEK
TLV (mg/m³): 589.77
Maximum Hourly Emission Rate (lbs/hr): 1.55
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 544.2
MAGLC (ug/m³): 14042.1

Pollutant: Toluene*
TLV (mg/m³): 188.40
Maximum Hourly Emission Rate (lbs/hr): 7.08
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2484.9
MAGLC (ug/m³): 4485.7

*Toluene emissions were based on the combined emissions from emissions units P003, P004, P005 and P801

Pollutant: Acetone

TLV (mg/m³): 1187.12

Maximum Hourly Emission Rate (lbs/hr): 2.48

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 870.5

MAGLC (ug/m³): 28246.8

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or clean-up materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
4. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final

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permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit annual reports that summarize the total annual actual OC emissions from clean-up operations. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
2. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - b. an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1 shall be determined in

Emissions Unit ID: **P801**

accordance with the following methods:

- a. Emission Limitation
7.3 tons OC/year

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in section C.2 of this permit.

- b. Emission Limitation
OC emissions shall not exceed 8 pounds per hour and 40 pounds per day

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in section C.1 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

None