



Environmental
Protection Agency

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

7/26/2012

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

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

Facility ID: 0448011215
Permit Number: P0109726
Permit Type: Renewal
County: Lucas

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
TDES; Michigan; Indiana; Canada

Certified Mail

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

HA International produces refractory coatings used in the foundry industry. Typically these are silica based mixes with water or hydrocarbon-based liquids added. Small amounts of formaldehyde may be added to some products as a preservative. Baghouses are used for particulate control. The facility has 9 mixers (P002, P005, P010, P011, P018, P019, P021, P022, and P023) and one liquid organics repackaging operation (P025) which are all sources of air emissions. All the mixers are sources of volatile organic compound (VOC) emissions and particulate emissions with the exception of P019 which does not emit particulates. P025 only emits VOCs.

This permit is an administrative permit modification for all the permitted emissions units at this facility. The facility applied for a permit renewal with changes to the facility-wide VOC emissions and changes to allow operational flexibility on P021, but with the request for increased facility-wide VOC emissions, it is appropriate to classify this as an administrative modification.

3. Facility Emissions and Attainment Status:

Facility-wide individual HAPs are restricted to 8 tons per year and facility-wide combined HAPs emissions are restricted to 20 tons per year. Facility-wide VOC emissions are restricted to 60 tons per year and facility-wide particulate emissions are restricted to 39.6 tons per year. These federally enforceable restrictions allow HA International to remain a minor source for PSD and Title V purposes.

Lucas County is classified as attainment for all criteria pollutants.

4. Source Emissions:

The permit allowable emissions rates are as follows:

EU Id	Individual VOC, lb/hr	Individual VOC, tpy	Individual stack PE, lb/hr	Individual stack PE, tpy	Individual fugitive PE, lb/hr	Individual fugitive PE, tpy	Facility-wide limitations			
							VOC, tpy	Stack PE, tpy	Individual HAP, tpy	Combined HAPs, tpy
P002	56	60	0.8	3.5	3.5	15.3	60	39.6	8	20
P005	79	60	1.3	5.7	5.6	24.5				
P010	30	60	0.7	3.1	3.1	13.6				
P011	13.6	59.6	0.2	0.9	0.8	3.5				
P018	30	60	1.0	4.4	4.5	19.7				
P019	112	60	N/A	N/A	N/A	N/A				
P021	65	60	1.5	6.6	6.5	28.5				
P022	65	60	1.5	6.6	6.5	28.5				
P023	65	60	1.5	6.6	6.5	28.5				



Table with 10 columns: P025, 5.5, 1.1, N/A, N/A, N/A, N/A, empty, empty, empty

5. Conclusion:

This permit renewal is non-controversial and should be issued draft to make the new facility-wide limitations federally enforceable.

6. Please provide additional notes or comments as necessary:

This FEPTIO administrative modification will address the applicability of the new version of OAC rule 3745-21-07. The facility was exempt from the requirements of the OAC rule 3745-21-07 which was effective June 15, 1999. On September 19, 2011, a new version of OAC rule 3745-21-07 became effective and the new rule does not apply to this facility. Therefore, all references to the exemption from OAC rule 3745-21-07 and any applicable additional terms and conditions have been removed in this FEPTIO.

The HA International permit application also addresses the following:

- An administrative modification to reduce particulate emissions (fugitive and stack) due to an adjustment to the dry materials batch size on P002. The facility maintains that 7,000 lb/hr is a more practical batch size for dry materials and requests emissions to be adjusted accordingly.
• An administrative modification to correct a typographical error in the allowable emissions rate for fugitive particulates, resulting in an increase in emissions due to the typographical error in P010. No physical changes in the process have occurred. Emissions will be corrected from 11 tpy to 13.6 tpy for fugitive particulates.
• An administrative modification for a small increase in the maximum VOC usage and emissions rate on P021 to allow for operational flexibility. These changes will allow operational flexibility to make any of HA International's water-based coatings products on P021 as well as P022 and P023.
• An administrative modification to increase individual VOC emissions limits to 60 tpy on P011, P018, P022, and P023 to account for the worst-case emissions PTE calculations to represent the maximum solvent addition rate of low vapour pressure VOC-containing liquid organic materials (i.e. materials with a vapor pressure less than or equal to 1.9 kPa).
• An administrative modification for an increase in the facility-wide VOC emissions from 40 tpy to 60 tpy.

TDOES has reviewed each of these points and has determined the following:

Administrative Modification

The application requests an increase in facility-wide VOC emissions, changes for more operational flexibility on mixer P021. It also requests increases in the VOC tpyallowables for P005, P011, P018, P021, P022, and P023 and increases the facility-wide VOC limit to 60 tpy for all emissions units at this facility. The original PTI incorrectly identified the potential of the facility at 40 tpy VOC emissions and they need 60 tpy VOC emissions for operational flexibility. This modification also corrects typographical errors in P010 and reduces emissions on P002 due to lower maximum dry material addition rates.

OAC rule 3745-31-01(QQQ)(1)(a)(v)

'Modify' or 'modification' shall not include use of an alternate fuel or raw material that the source is capable of accommodating and is not expressly prohibited from using under any permit condition or applicable requirement of the federal Clean Air Act; an increase in the hours of operation or in the production rate that



is not expressly prohibited under any permit condition or applicable requirement of the Ohio EPA environmental protection agency or the federal Clean Air Act.

OAC rule 3745-31-01(QQQ)(1)(a)(vii) 'Modify' or 'modification' shall not include allowable emission increases due to an alternative emission limit that satisfies the criteria set forth in division (E) of section 3704.03 of the Revised Code and is consistent with division (K) of section 3704.036 of the Revised Code.

Therefore, the changes to P002, P005, P010, P011, P018, P019, P021, P022, P023, and P025 will be handled as an administrative modification.

BAT Determination for an Increase in Emissions

Because there is not a physical modification to any of the emissions units, S.B. 265 does not affect these sources and the facility must continue to apply the BAT determination of OAC rule 3745-31-05(A)(3).

The following BAT determinations will not be changed:

VOC emissions - mixers

The existing BAT determination established VOC emissions for P002, P005, P010, P011, P018, P019, and P021 through P023 using a paint manufacturing emission factor of 0.034 lb VOC/lb solvent used when the vapor pressure of the liquid organic material being mixed is greater than 1.9 kPa and 0.5% when the vapor pressure of the liquid organic material being mixed with the powdered ingredients is less than or equal to 1.9 kPa. BAT also requires using fabric filters during the operation of each emissions unit to control particulate emissions (except P019 which does not have any particulate emissions).

Particulate emissions - mixers

The existing BAT determination established particulate emissions using an AP-42 emission factor of 20 lb PM emitted/ton dry material added (uncontrolled) and, at the facility's request, emissions were calculated using 95% capture efficiency and 99% control efficiency and a 20% allowance was added to the calculated emissions to allow for stack testing error.

VOC emissions – organic liquid repackaging system (P025)

The existing BAT determination established VOC emissions using an emission factor of 0.011 lb VOC/lb solvent transferred (one-third of 0.034 lb VOC/lb solvent emission factor used for the mixer emissions).



Facility-wide emission limitations

HA International previously volunteered to restrict the following facility-wide emissions: 39.6 tpy particulate emissions, 8 tpy individual HAPs emissions, and 20 tpy combined HAPs. Under this permit application, the facility has requested an increase in the facility-wide VOC emissions from 40 tpy to 60 tpy.

In accordance with current OEPA policies, all monitoring, recordkeeping, and reporting requirements for the facility-wide emissions limitations have been moved to Part B. Facility-wide Terms and Conditions of the permit.

Emissions Calculations

For each permit, hourly emissions were set at levels requested by HA International based on predicted maximum throughputs. Annual allowable emissions were set at the lower of the PTE or the requested annual facility-wide emissions limitation. Because of the wide variety of products manufactured, no throughput and VOC content was required for federal enforceability in compliance with USEPA guidance. Instead, a one-time, worst case formulation evaluation was required for each product to demonstrate compliance with the maximum short term emissions rate.

For example, for P002

$$\text{PE, stack } 7,000 \text{ lb solids} * (20 \text{ lb PE/ton solids}) * (0.95) * (1-0.99) \div ((0.8) * (2,000 \text{ lb/ton})) = 0.8 \text{ lb/hr PE}$$

$$0.8 \text{ lb/hr PE} * 8,760 \text{ hr/yr} \div 2,000 \text{ lb/ton} = 3.5 \text{ tpy PE}$$

$$\text{PE, fugitive } 7,000 \text{ lb solids} * (20 \text{ lb PE/ton solids}) * (1-0.95) \div (2,000 \text{ lb/ton}) = 3.5 \text{ lb/hr PE}$$

$$3.5 \text{ lb/hr PE} * 8,760 \text{ hr/yr} \div 2,000 \text{ lb/ton} = 15.3 \text{ tpy PE}$$

$$\text{VOC } 1,650 \text{ lb solvent used/hr} * (0.034 \text{ lb VOC/lb solvent used}) = 56.0 \text{ lb/hr VOC}$$

$$56.0 \text{ lb/hr} * 8,760 \text{ hr/yr} \div 2,000 \text{ lb/ton} = 245 \text{ tpy VOC}$$

Since the facility-wide emissions limitation for VOC = 60 tpy, P002 will be restricted to 60 tpy VOC.

The permit allowable emissions rates for all of the existing sources are as follows:

Emission Unit Description (Permit No)	Max. dry solids and solvent addition rate (lb/hr)	Description of Change	Old PE, stack emissions (lb/hr&tpy)	New PE, stack emissions (lb/hr&tpy)	Old PE, fugitive emissions (lb/hr&tpy)	New PE, fugitive emissions (lb/hr&tpy)	Old VOC emissions (lb/hr&tpy)	New VOC emissions (lb/hr&tpy)
P002 - No. 8, Baker Perkins mixer (PTIO P0109045)	7,000 dry mat'l & 1,650 high vapor pres. mat'l & 7,000 low vapor pres. mat'l	Reduced dry solids addition rate and increased individual annual and facility-wide VOC limit to 60 tpy	1.3 & 5.7	0.8 & 3.5 (decreased)	5.7 & 25.0	3.5 & 15.3 (decreased)	56 & 40	56 & 60 (increased based on low vapor pres. mat'l as worst-case)



P005 – Cowles mixers (PTO issued 9/24/07)	11,200 dry mat'l& 2,325 high vapor pres. mat'l& 8,370 low vapor pres. mat'l	Increased individual annual and facility-wide VOC limit to 60 tpy	1.3 & 5.7	unchanged	5.6 & 24.5	unchanged	79 & 40	79 & 60 (increased based on high vapor pres. mat'l as worst-case)
P010 – No. 2 J.H. Day mixer (PTO issued 9/24/07)	6,000 dry mat'l& 206 high vapor pres. mat'l& 6,000 low vapor pres. mat'l	Increased individual and annual VOC limit to 60 tpy and correct typo. error in annual fugitive PE limit	0.7 & 3.1	unchanged	3.1 & 11	3.1 & 13.6 (corrected typographical error – permit indicated 11 tpy and it was corrected to 13.6 tpy)	7.0 & 30.7	30 & 60 (increased based on low vapor pres. mat'l as worst-case)
P011 – Mixer No. 21 (PTO issued 9/24/07)	1,600 dry mat'l& 400 high vapor pres. mat'l& 1,600 low vapor pres. mat'l	Increased max. addition rate of high vapor pres. mat'l's and increased individual annual and facility-wide VOC limit to 60 tpy	0.2 & 0.9	unchanged	0.8 & 3.5	unchanged	8.7 & 38.1	13.6 & 59.6 (increased based on high vapor pres. mat'l as worst-case)
P018 - #5 paste machine (PTIO P0109045)	9,000 dry mat'l& 300 high vapor pres. mat'l& 6,000 low vapor pres. mat'l	Increased individual annual and facility-wide VOC limit to 60 tpy	1.0 & 4.4	unchanged	4.5 & 19.7	unchanged	10.2 & 40	30 & 60 (increased based on low vapor pres. mat'l as worst-case)
P019 – let down station #9 (PTO issued 9/24/07)	N/A & 3,300 high vapor pres. mat'l& 0 low vapor pres. mat'l	Increased individual annual and facility-wide VOC limit to 60 tpy	N/A	N/A	N/A	N/A	112 & 40	112 & 60 (increased)
P021 – Nos. 23, 24, 25 Toledo Shars (PTIO P0109045)	13,000 dry mat'l& 150 high vapor pres. mat'l& 13,000 low vapor pres. mat'l	Increased individual annual and facility-wide VOC limit to 60 tpy	1.5 & 6.6	unchanged	6.5 & 28.5	unchanged	5.1 & 22.3	65 & 60 (increased based on low vapor pres. mat'l as worst-case)
P022 – No. 30 Milshar 1 (PTO issued	13,000 dry mat'l& 180 high vapor	Increased individual annual and	1.5 & 6.6	unchanged	6.5 & 28.5	unchanged	6.1 & 26.7	65 & 60 (increased based on low



9/24/07)	pres. mat'l & 13,000 low vapor pres. mat'l	facility-wide VOC limit to 60 tpy						vapor pres. mat'l as worst-case)
P023 – No. 31 Milshar 2 (PTO issued 9/24/07)	13,000 & 180 high vapor pres. mat'l's & 13,000 low vapor pres. mat'l's	Increased individual annual and facility-wide VOC limit to 60 tpy	1.5 & 6.6	unchanged	6.5 & 28.5	unchanged	6.1 & 26.7	65 & 60 (increased based on low vapor pres. mat'l as worst-case)
P025 – liquid organic repackaging (PTIO P0109052)	N/A & 500 lbmat'l transferred	Update facility-wide emissions only	N/A	N/A	N/A	N/A	5.5 & 1.1	Unchanged (*only updated facility-wide VOC emissions)

Air Toxics Modeling

Because several of these emission units are regulated by a GACT (40 CFR 63, Subpart BBBB) [P002, P005, P010, P011, P018, P019, P021, P022 and P023], air toxics modeling is not required. All air toxics language previously included in the individual emissions units terms were removed and a reference to the applicable GACT was included in Section B. Facility-wide Terms and Conditions of the permit.

New modeling to demonstrate compliance with the Ohio EPA's "Air Toxics Policy" for P025, which is not regulated by the GACT, was not necessary because there was not an increase in emissions due to the modification. The existing air toxics restrictions from the previous permit will be carried forward into the permit for P025.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC (Facility-wide)	60 (20 increase)
PE (Facility-wide)	39.6 (unchanged)
HAPs (Facility-wide)	8 (individual, unchanged)
HAPs (Facility-wide)	20 (combined, unchanged)

PUBLIC NOTICE
7/26/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

HA INTERNATIONAL LLC

4243 SOUTH AVE,
TOLEDO, OH 43615

Lucas County

FACILITY DESC.: All Other Miscellaneous Chemical Product and Preparation Manufacturing

PERMIT #: P0109726

PERMIT TYPE: Renewal

PERMIT DESC: Administrative Modification being processed as a Renewal for all emissions units at this Refractory Coatings production facility.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Mary Lehman-Schmidt, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604. Ph: (419)936-3015

Ohio

**Environmental
Protection Agency**

DRAFT

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

Facility ID:	0448011215
Permit Number:	P0109726
Permit Type:	Renewal
Issued:	7/26/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



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

Table of Contents

Authorization 1
A. Standard Terms and Conditions 4
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 5
2. Who is responsible for complying with this permit? 5
3. What records must I keep under this permit? 5
4. What are my permit fees and when do I pay them?..... 5
5. When does my PTIO expire, and when do I need to submit my renewal application? 5
6. What happens to this permit if my project is delayed or I do not install or modify my source? 6
7. What reports must I submit under this permit? 6
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? 6
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 6
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 7
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 7
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 7
13. Can I transfer this permit to a new owner or operator?..... 8
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 8
15. What happens if a portion of this permit is determined to be invalid? 8
B. Facility-Wide Terms and Conditions..... 9
C. Emissions Unit Terms and Conditions 15
1. P002 16
2. P005 22
3. P010 28
4. P011 34
5. P018 40
6. P019 46
7. P021 50
8. Emissions Unit Group -similar units: P022, P023 56
9. P025 62

Authorization

Facility ID: 0448011215

Application Number(s): A0043856, A0044811, A0044832, A0044854

Permit Number: P0109726

Permit Description: Administrative Modification being processed as a Renewal for all emissions units at this Refractory Coatings production facility.

Permit Type: Renewal

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

Issue Date: 7/26/2012

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

HA INTERNATIONAL LLC
4243 SOUTH AVE
TOLEDO, OH 43615

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0109726

Permit Description: Administrative Modification being processed as a Renewal for all emissions units at this Refractory Coatings production facility.

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

Emissions Unit ID:	P002
Company Equipment ID:	P002
Superseded Permit Number:	P0109045
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	P005
Superseded Permit Number:	P0088161
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P010
Company Equipment ID:	P010
Superseded Permit Number:	P0088161
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	P011
Superseded Permit Number:	P0088161
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P018
Company Equipment ID:	P018
Superseded Permit Number:	P0109045
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P019
Company Equipment ID:	P019
Superseded Permit Number:	P0088161
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P021
Company Equipment ID:	P021
Superseded Permit Number:	P0109045
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P025
Company Equipment ID:	NA
Superseded Permit Number:	P0109052
General Permit Category and Type:	Not Applicable



Group Name: similar units

Emissions Unit ID:	P022
Company Equipment ID:	P022
Superseded Permit Number:	P0088161
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P023
Company Equipment ID:	P023
Superseded Permit Number:	P0088161
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) B.2. through B.5.
2. The combined emissions of Volatile Organic Compounds (VOC) from all emission units at this facility shall not exceed 60 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
 - a) **VOC emissions:**

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

 - (1) The permittee shall collect and record the following information monthly for the purpose of determining compliance with the rolling, 12-month VOC emission limitation for all emissions units facility-wide:
 - a. For P002, P005, P010, P011, P018, P019, P021, P022, and P023:
 - i. the company identification for each product manufactured;
 - ii. the number of tons of all VOC-containing liquid organic materials mixed where the vapor pressure of the VOC-containing liquid organic materials is less than or equal to 1.9 kPa;
 - iii. the number of tons of all VOC-containing liquid organic materials mixed where the vapor pressure of the VOC-containing liquid organic materials is greater than 1.9 kPa;
 - iv. the VOC emission rate from all VOC-containing liquid organic materials mixed where the vapor pressure of the VOC-containing liquid organic material is less than or equal to 1.9 kPa, i.e., ((ii.)x(0.005)) in tons per month;
 - v. the VOC emission rate from all VOC-containing liquid organic materials mixed where the vapor pressure of the VOC-containing liquid organic material is greater than 1.9 kPa, i.e., ((iii.)x(0.034)) in tons per month;
 - vi. the monthly total VOC emissions rate from all VOC-containing liquid organic materials calculated as the sum of (iv.) + (v.), in tons per month; and

emission rate from the stacks of all emission units at this facility to the PE emissions for the preceding eleven calendar months from all emission units at this facility, in tons per year, i.e., the rolling, 12-month summation of c. for all emissions units.

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

a) **HAPs emissions:**

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

- (1) The permittee shall collect and record the following information for each month for all emissions units located at this facility:

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

- i. the company identification for each HAP containing material mixed;
- ii. the number of gallons or pounds of each HAP containing material mixed;
- iii. the individual HAP content of each HAP containing material, in pounds per gallon or pound per pound;
- iv. the emissions of each individual HAP calculated as the summation of ((ii.) x (iii.)) for each dry solid material plus the summation of ((ii.) x (iii.) x (0.034)) for each liquid material for each individual HAP, in tons per month;
- v. the combined HAP emissions from all HAP containing materials mixed calculated as a summation of the individual HAP emissions calculated in (iv.) for all HAPs, in tons per month;
- vi. the facility-wide rolling, 12-month summation of individual HAP emissions for all materials mixed, calculated by adding the current month's individual HAP emissions (iv.) to the individual HAP emissions for the preceding eleven calendar months, in tons per year; and
- vii. the facility-wide rolling, 12-month summation of combined HAP emissions for all materials mixed, calculated by adding the current month's combined HAP emissions (v.) to the combined HAP emissions for the preceding eleven calendar months, in tons per year.

b. For P025:

- i. the company identification for each HAP containing material transferred;
- ii. the number of gallons of each HAP containing material transferred;

- iii. the individual HAP content of each HAP containing material transferred, in pounds per gallon;
 - iv. the emissions of each individual HAP calculated as the summation of ((ii.) x (iii.) x (0.011)) for each liquid material transferred for each individual HAP, in tons per month;
 - v. the combined HAP emissions from all HAP containing materials transferred calculated as a summation of the individual HAP emissions calculated in (iv.) for all HAPs, in tons per month;
 - vi. the facility-wide rolling, 12-month summation of individual HAP emissions for all materials transferred, calculated by adding the current month's individual HAP emissions (iv.) to the individual HAP emissions for the preceding eleven calendar months, in tons per year; and
 - vii. the facility-wide rolling, 12-month summation of combined HAP emissions for all materials transferred, calculated by adding the current month's combined HAP emissions (v.) to the combined HAP emissions for the preceding eleven calendar months, in tons per year.
- c. the rolling, 12-month summation of the facility-wide individual HAP emissions, calculated by adding the current month's individual HAP emissions from all emission units at this facility to the individual HAP emissions for the preceding eleven calendar months from all emission units at this facility, in tons per year, i.e. [(4.a)(1)a.vi.) + (4.a)(1)b.vi.)].
 - d. the rolling, 12-month summation of the facility-wide combined HAP emissions, calculated by adding the current month's combined HAP emissions from all emission units at this facility to the combined HAP emissions for the preceding eleven calendar months from all emission units at this facility, in tons per year, i.e. [(4.a)(1)a.vii.) + (4.a)(1)b.vii.)].
5. The permittee shall submit quarterly deviation (excursion) reports that identify all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
- b) an identification of each month during which the facility-wide PE from all stacks exceeded 39.6 tons as a rolling, 12-month summation, and the actual 12-month summation of any such PE for each such month;
 - c) an identification of each month during which the facility-wide VOC emissions exceeded 60 tons as a rolling, 12-month summation, and the actual 12-month summation of any such VOC emissions for each such month;
 - d) an identification of each month during which the combined facility-wide emissions of any individual HAP exceeded 8.0 tons per rolling 12-month period, and the actual 12-month summation of any such HAP emissions for each such month;

- e) an identification of each month during which the combined facility-wide emissions of combined HAPs exceeded 20.0 tons per rolling, 12-month period, and the actual 12-month summation of any such HAP emissions for each such month; and
 - f) If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.
6. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart BBBBBBB, National Emission Standards for Hazardous Air Pollutants for Area Sources: Chemical Preparations Industry. The following emissions units are affected sources: P002, P005, P010, P011, P018, P019, P021, P022, P023. Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

C. Emissions Unit Terms and Conditions

1. P002

Operations, Property and/or Equipment Description:

No. 8 solvent paste machine

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b. and B.2. through B.5.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.8 pound per hour and 3.5 tons per year fugitive particulate emissions (PE) shall not exceed 3.5 pounds per hour and 15.3 tons per year emissions of volatile organic compounds (VOC) shall not exceed 56 pounds per hour see b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-05(D)	facility-wide PE from all stacks shall not exceed 39.6 tons as a rolling, 12-month summation

Draft Permit-to-Install and Operate

HA INTERNATIONAL LLC

Permit Number: P0109726

Facility ID: 0448011215

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		facility-wide VOC shall not exceed 60 tons as a rolling, 12-month summation facility-wide emissions of hazardous air pollutants (HAP) shall not exceed 8 tons individual, or 20 tons of any combination of HAPs as a rolling, 12-month summation see b)(2)d.
c.	OAC rule 3745-17-07(A)(1)	visible emissions of particulate from any stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average
d.	OAC rule 3745-17-07(B)(1)	visible emissions of fugitive dust from this emissions unit shall not exceed 20 percent opacity as a 3-minute average
e.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)e.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-07(B)(1).
- b. The hourly and annual particulate emission limitations were established to reflect the controlled potential to emit for this emissions unit. In accordance with the permit application, the permittee has committed to use a dry filtration system with a minimum of 95% capture and 99% control efficiency whenever the emissions unit is in operation for the purpose of ensuring compliance with the particulate emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the usage of a dry filtration system.
- c. The hourly and annual PE and VOC emission limitations were established to reflect the potential to emit for this emissions unit based on the worst case production data provided in the permittee's application. In accordance with the permit application, the permittee has committed to the following:
 - i. maximum dry addition rate of 7,000 lbs per hour for calculating the particulate emissions;

- a. 20 percent opacity from any stack as a 6-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

- b. Emission limitation:

20 percent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

- c. Emission limitation:

0.8 pound per hour of PE from the stack.

Applicable compliance method:

This emissions limitation was established to reflect the controlled potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (7,000 pounds per hour) by the capture efficiency (0.95), and one minus the control efficiency (1-0.99) and divide the result by 2000 pounds per ton.

If required, compliance shall be demonstrated through stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures of Method 5 of 40 CFR Part 60 Appendix A.

- d. Emission Limitation:

3.5 tons per year of PE from the stack.

Applicable Compliance Method:

This emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 0.8 pound of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

e. Emission limitation:

3.5 pounds per hour of PE fugitive.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (7,000 pounds per hour) by one minus the capture efficiency (1 - 0.95) and divide the result by 2000 pounds per ton.

f. Emission Limitation:

15.3 tons per year of PE fugitive.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 3.5 pounds of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

g. Emission limitation:

56 pounds per hour of VOC from this emissions unit.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the worst-case operating scenario, as follows:

the emission factor specified in STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005, as follows: multiply the emission factor in pounds of VOC emissions per pound of solvent (worst-case 0.034) by the maximum hourly rate of VOC-containing liquid organic material addition (1,650 pounds).

h. Emission limitation:

39.6 tons per year PE facility-wide from all stacks.

Applicable compliance method:

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

i. Emission limitation:

60 tons per year VOC facility-wide.

Applicable compliance method:

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

j. Emission limitation:

8 tons per year individual HAP facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

k. Emission limitation:

20 tons per year combined HAPs facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

g) Miscellaneous Requirements

(1) None.

2. P005

Operations, Property and/or Equipment Description:

Nos. 10/11 solvent cowles mixer

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

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

a. None.

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

a. b)(1)b. and B.2. through B.5.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	particulate emissions (PE) from the stack serving this emissions unit shall not exceed 1.3 pounds per hour and 5.7 tons per year fugitive particulate emissions (PE) shall not exceed 5.6 pounds per hour and 24.5 tons per year volatile organic compound emissions (VOC) shall not exceed 79 pounds per hour see b)(2)a. through b)(2)c.
b.	OAC rule 3745-31-05(D)	facility-wide PE from all stacks shall not exceed 39.6 tons as a rolling, 12-month summation

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		facility-wide VOC shall not exceed 60 tons as a rolling, 12-month summation facility-wide emissions of hazardous air pollutants (HAP) shall not exceed 8 tons individual, or 20 tons of any combination of HAPs as a rolling, 12-month summation see b)(2)d.
c.	OAC rule 3745-17-07(A)(1)	visible emissions of particulate from any stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average
d.	OAC rule 3745-17-07(B)(1)	visible emissions of fugitive dust from this emissions unit shall not exceed 20 percent opacity as a 3-minute average
e.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)e.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-07(B)(1).
- b. The hourly and annual particulate emission limitations were established to reflect the controlled potential to emit for this emissions unit. In accordance with the permit application, the permittee has committed to use a dry filtration system with a minimum of 95% capture and 99% control efficiency whenever the emissions unit is in operation for the purpose of ensuring compliance with the particulate emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the usage of a dry filtration system.
- c. The hourly and annual PE and VOC emission limitations were established to reflect the potential to emit for this emissions unit based on the worst case production data provided in the permittee's application. In accordance with the permit application, the permittee has committed to the following:
 - i. maximum dry addition rate of 11,200 lbs per hour for calculating the particulate emissions;

- a. 20 percent opacity from any stack as a 6-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

- b. Emission limitation:

20 percent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

- c. Emission limitation:

1.3 pounds per hour of PE from the stack.

Applicable compliance method:

This emissions limitation was established to reflect the controlled potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (11,200 pounds per hour) by the capture efficiency (0.95), and one minus the control efficiency (1-0.99) and divide the result by 2000 pounds per ton.

If required, compliance shall be demonstrated through stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures of Method 5 of 40 CFR Part 60 Appendix A.

- d. Emission Limitation:

5.7 tons per year of PE from the stack.

Applicable Compliance Method:

This emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 1.3 pounds of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

e. Emission limitation:

5.6 pounds per hour of PE fugitive.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (11,200 pounds per hour) by one minus the capture efficiency (1 - 0.95) and divide the result by 2000 pounds per ton.

f. Emission Limitation:

24.5 tons per year of PE fugitive.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 5.6 pounds of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

g. Emission limitation:

79 pounds per hour of VOC from this emissions unit.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the worst-case operating scenario, as follows:

the emission factor specified in STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005, as follows: multiply the emission factor in pounds of VOC emissions per pound of solvent (worst-case 0.034) by the maximum hourly rate of VOC-containing liquid organic material addition (2,325 pounds).

h. Emission limitation:

39.6 tons per year PE facility-wide from all stacks.

Applicable compliance method:

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

i. Emission limitation:

60 tons per year VOC facility-wide.

Applicable compliance method:

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

j. Emission limitation:

8 tons per year individual HAP facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

k. Emission limitation:

20 tons per year combined HAPs facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

g) Miscellaneous Requirements

(1) None.

3. P010

Operations, Property and/or Equipment Description:

No. 2 paste machine

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b. and B.2. through B.5.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.7 pounds per hour and 3.1 tons per year fugitive particulate emissions (PE) shall not exceed 3.1 pounds per hour and 13.6 tons per year volatile organic compound emissions (VOC) shall not exceed 30 pounds per hour see b)(2)a. through b)(2)c.

Draft Permit-to-Install and Operate

HA INTERNATIONAL LLC

Permit Number: P0109726

Facility ID: 0448011215

Effective Date: To be entered upon final issuance

b.	OAC rule 3745-31-05(D)	facility-wide PE from all stacks shall not exceed 39.6 tons as a rolling, 12-month summation facility-wide VOC shall not exceed 60 tons as a rolling, 12-month summation facility-wide emissions of hazardous air pollutants (HAP) shall not exceed 8 tons individual, or 20 tons of any combination of HAPs as a rolling, 12-month summation see b)(2)d.
c.	OAC rule 3745-17-07(A)(1)	visible emissions of particulate from any stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average
d.	OAC rule 3745-17-07(B)(1)	visible emissions of fugitive dust from this emissions unit shall not exceed 20 percent opacity as a 3-minute average
e.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)e.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-07(B)(1).
- b. The hourly and annual particulate emission limitations were established to reflect the controlled potential to emit for this emissions unit. In accordance with the permit application, the permittee has committed to use a dry filtration system with a minimum of 95% capture and 99% control efficiency whenever the emissions unit is in operation for the purpose of ensuring compliance with the particulate emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the usage of a dry filtration system.
- c. The hourly and annual PE and VOC emission limitations were established to reflect the potential to emit for this emissions unit based on the worst case production data provided in the permittee's application. In accordance with the permit application, the permittee has committed to the following:
 - i. maximum dry addition rate of 6,000 lbs per hour for calculating the particulate emissions;

- a. 20 percent opacity from any stack as a 6-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

- b. Emission limitation:

20 percent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

- c. Emission limitation:

0.7 pound per hour of PE from the stack.

Applicable compliance method:

This emissions limitation was established to reflect the controlled potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (6,000 pounds per hour) by the capture efficiency (0.95), and one minus the control efficiency (1-0.99) and divide the result by 2000 pounds per ton.

If required, compliance shall be demonstrated through stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures of Method 5 of 40 CFR Part 60 Appendix A.

- d. Emission Limitation:

3.1 tons per year of PE from the stack.

Applicable Compliance Method:

This emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 0.7 pound of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

e. Emission limitation:

3.1 pounds per hour of PE fugitive.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (6,000 pounds per hour) by one minus the capture efficiency (1 - 0.95) and divide the result by 2000 pounds per ton.

f. Emission Limitation:

13.6 tons per year of PE fugitive.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 3.1 pounds of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

g. Emission limitation:

30 pounds per hour of VOC from this emissions unit.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the worst-case operating scenario, as follows:

the emission factor specified in STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005, as follows: multiply the emission factor in pounds of VOC emissions per pound of solvent (worst-case 0.005) by the maximum hourly rate of VOC-containing liquid organic material addition (worst-case 6,000 pounds).

h. Emission limitation:

39.6 tons per year PE facility-wide from all stacks.

Applicable compliance method:

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

i. Emission limitation:

60 tons per year VOC facility-wide.

Applicable compliance method:

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

j. Emission limitation:

8 tons per year individual HAP facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

k. Emission limitation:

20 tons per year combined HAPs facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

g) Miscellaneous Requirements

(1) None.

4. P011

Operations, Property and/or Equipment Description:

No. 21 solvent drum mixer

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b. and B.2. through B.5.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.2 pound per hour and 0.9 ton per year fugitive particulate emissions (PE) shall not exceed 0.8 pound per hour and 3.5 tons per year volatile organic compound emissions (VOC) shall not exceed 13.6 pounds per hour and 59.6 tons per year see b)(2)a. through b)(2)c.

Draft Permit-to-Install and Operate

HA INTERNATIONAL LLC

Permit Number: P0109726

Facility ID: 0448011215

Effective Date: To be entered upon final issuance

b.	OAC rule 3745-31-05(D)	facility-wide PE from all stacks shall not exceed 39.6 tons as a rolling, 12-month summation facility-wide VOC shall not exceed 60 tons as a rolling, 12-month summation facility-wide emissions of hazardous air pollutants (HAP) shall not exceed 8 tons individual, or 20 tons of any combination of HAPs as a rolling, 12-month summation see b)(2)d.
c.	OAC rule 3745-17-07(A)(1)	visible emissions of particulate from any stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average
d.	OAC rule 3745-17-07(B)(1)	visible emissions of fugitive dust from this emissions unit shall not exceed 20 percent opacity as a 3-minute average
e.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)e.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-07(B)(1).
- b. The hourly and annual particulate emission limitations were established to reflect the controlled potential to emit for this emissions unit. In accordance with the permit application, the permittee has committed to use a dry filtration system with a minimum of 95% capture and 99% control efficiency whenever the emissions unit is in operation for the purpose of ensuring compliance with the particulate emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the usage of a dry filtration system.
- c. The hourly and annual PE and VOC emission limitations were established to reflect the potential to emit for this emissions unit based on the worst case production data provided in the permittee's application. In accordance with the permit application, the permittee has committed to the following:
 - i. maximum dry addition rate of 1,600 lbs per hour for calculating the particulate emissions;

- a. 20 percent opacity from any stack as a 6-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

- b. Emission limitation:

20 percent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

- c. Emission limitation:

0.2 pound per hour of PE from the stack.

Applicable compliance method:

This emissions limitation was established to reflect the controlled potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (1,600 pounds per hour) by the capture efficiency (0.95), and one minus the control efficiency (1-0.99) and divide the result by 2000 pounds per ton.

If required, compliance shall be demonstrated through stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures of Method 5 of 40 CFR Part 60 Appendix A.

- d. Emission Limitation:

0.9 ton per year of PE from the stack.

Applicable Compliance Method:

This emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 0.2 pound of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

e. Emission limitation:

0.8 pound per hour of PE fugitive.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (1,600 pounds per hour) by one minus the capture efficiency (1 - 0.95) and divide the result by 2000 pounds per ton.

f. Emission Limitation:

3.5 tons per year of PE fugitive.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 0.8 pound of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

g. Emission limitation:

13.6 pounds per hour of VOC from this emissions unit.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the worst-case operating scenario, as follows:

the emission factor specified in STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005, as follows: multiply the emission factor in pounds of VOC emissions per pound of solvent (worst-case 0.034) by the maximum hourly rate of VOC-containing liquid organic material addition (400 pounds).

h. Emission Limitation:

59.6 tons per year of VOC from this emissions unit.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 13.6 pounds of VOC per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

i. Emission limitation:

39.6 tons per year PE facility-wide from all stacks.

Applicable compliance method:

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

j. Emission limitation:

60 tons per year VOC facility-wide.

Applicable compliance method:

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

k. Emission limitation:

8 tons per year individual HAP facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

l. Emission limitation:

20 tons per year combined HAPs facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

g) Miscellaneous Requirements

(1) None.

5. P018

Operations, Property and/or Equipment Description:

No. 5 paste (water-based)

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b. and B.2. through B.5.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	particulate emissions (PE) from the stack serving this emissions unit shall not exceed 1.0 pound per hour and 4.4 tons per year fugitive particulate emissions (PE) shall not exceed 4.5 pounds per hour and 19.7 tons per year volatile organic compound emissions (VOC) shall not exceed 30 pounds per hour see b)(2)a. through b)(2)c.

Draft Permit-to-Install and Operate

HA INTERNATIONAL LLC

Permit Number: P0109726

Facility ID: 0448011215

Effective Date: To be entered upon final issuance

b.	OAC rule 3745-31-05(D)	facility-wide PE from all stacks shall not exceed 39.6 tons as a rolling, 12-month summation facility-wide VOC shall not exceed 60 tons as a rolling, 12-month summation facility-wide emissions of hazardous air pollutants (HAP) shall not exceed 8 tons individual, or 20 tons of any combination of HAPs as a rolling, 12-month summation see b)(2)d.
c.	OAC rule 3745-17-07(A)(1)	visible emissions of particulate from any stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average
d.	OAC rule 3745-17-07(B)(1)	visible emissions of fugitive dust from this emissions unit shall not exceed 20 percent opacity as a 3-minute average
e.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)e.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-07(B)(1).
- b. The hourly and annual particulate emission limitations were established to reflect the controlled potential to emit for this emissions unit. In accordance with the permit application, the permittee has committed to use a dry filtration system with a minimum of 95% capture and 99% control efficiency whenever the emissions unit is in operation for the purpose of ensuring compliance with the particulate emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the usage of a dry filtration system.
- c. The hourly and annual PE and VOC emission limitations were established to reflect the potential to emit for this emissions unit based on the worst case production data provided in the permittee's application. In accordance with the permit application, the permittee has committed to the following:
 - i. maximum dry addition rate of 9,000 lbs per hour for calculating the particulate emissions;

- a. 20 percent opacity from any stack as a 6-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

- b. Emission limitation:

20 percent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

- c. Emission limitation:

1.0 pound per hour of PE from the stack.

Applicable compliance method:

This emissions limitation was established to reflect the controlled potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (9,000 pounds per hour) by the capture efficiency (0.95), and one minus the control efficiency (1-0.99) and divide the result by 2000 pounds per ton.

If required, compliance shall be demonstrated through stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures of Method 5 of 40 CFR Part 60 Appendix A.

- d. Emission Limitation:

4.4 tons per year of PE from the stack.

Applicable Compliance Method:

This emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 1.0 pound of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

e. Emission limitation:

4.5 pounds per hour of PE fugitive.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (9,000 pounds per hour) by one minus the capture efficiency (1 - 0.95) and divide the result by 2000 pounds per ton.

f. Emission Limitation:

19.7 tons per year of PE fugitive.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 4.5 pounds of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

g. Emission limitation:

30 pounds per hour of VOC from this emissions unit.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the worst-case operating scenario, as follows:

the emission factor specified in STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005, as follows: multiply the emission factor in pounds of VOC emissions per pound of solvent (worst-case 0.005) by the maximum hourly rate of VOC-containing liquid organic material addition (6,000 pounds).

h. Emission limitation:

39.6 tons per year PE facility-wide from all stacks.

Applicable compliance method:

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

i. Emission limitation:

60 tons per year VOC facility-wide.

Applicable compliance method:

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

j. Emission limitation:

8 tons per year individual HAP facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

k. Emission limitation:

20 tons per year combined HAPs facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

g) Miscellaneous Requirements

(1) None.

6. P019

Operations, Property and/or Equipment Description:

No. 9 let down station

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b. and B.2. through B.5.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	volatile organic compound emissions (VOC) shall not exceed 112 pounds per hour see b)(2)a.
b.	OAC rule 3745-31-05(D)	facility-wide PE from all stacks shall not exceed 39.6 tons as a rolling, 12-month summation facility-wide VOC shall not exceed 60 tons as a rolling, 12-month summation facility-wide emissions of hazardous air pollutants (HAP) shall not exceed 8 tons individual, or 20 tons of any combination of HAPs as a rolling, 12-month summation see b)(2)b.

- (2) Additional Terms and Conditions
 - a. The hourly and annual VOC emission limitations were established to reflect the potential to emit for this emissions unit based on the worst case production data provided in the permittee's application. In accordance with the permit application, the permittee has committed to the following:
 - i. maximum dry addition rate of 0 lbs per hour for calculating the particulate emissions;
 - ii. maximum solvent addition rate of 3,300 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is greater than 1.9 kPa for calculating the volatile organic compound emissions; and
 - iii. maximum solvent addition rate of 0 pounds per hour where the vapor pressure of the VOC-containing liquid organic material is less than or equal to 1.9 kPa for calculating the volatile organic compound emissions.
 - b. The annual PE, VOC and HAP emission limitations were established with additional recordkeeping and/or reporting requirements included in Part B. Facility-wide Terms and Conditions to ensure compliance with these limitations.
- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- e) Reporting Requirements
 - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
 - (2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission limitation:

112 pounds per hour of VOC from this emissions unit.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the worst-case operating scenario, as follows:

the emission factor specified in STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005, as follows: multiply the emission factor in pounds of VOC emissions per pound of solvent (worst-case 0.034) by the maximum hourly rate of VOC-containing liquid organic material addition (3,300 pounds).

b. Emission limitation:

39.6 tons per year PE facility-wide from all stacks.

Applicable compliance method:

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

c. Emission limitation:

60 tons per year VOC facility-wide.

Applicable compliance method:

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

d. Emission limitation:

8 tons per year individual HAP facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

e. Emission limitation:

20 tons per year combined HAPs facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

Draft Permit-to-Install and Operate

HA INTERNATIONAL LLC

Permit Number: P0109726

Facility ID: 0448011215

Effective Date: To be entered upon final issuance

g) Miscellaneous Requirements

(1) None.

7. P021

Operations, Property and/or Equipment Description:

Nos. 23, 24, 25 Toledo Shar

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b. and B.2. through B.5.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	particulate emissions (PE) from the stack serving this emissions unit shall not exceed 1.5 pounds per hour and 6.6 tons per year fugitive particulate emissions (PE) shall not exceed 6.5 pounds per hour and 28.5 tons per year volatile organic compound emissions (VOC) shall not exceed 65 pounds per hour see b)(2)a. through b)(2)c.

Draft Permit-to-Install and Operate

HA INTERNATIONAL LLC

Permit Number: P0109726

Facility ID: 0448011215

Effective Date: To be entered upon final issuance

b.	OAC rule 3745-31-05(D)	facility-wide PE from all stacks shall not exceed 39.6 tons as a rolling, 12-month summation facility-wide VOC shall not exceed 60 tons as a rolling, 12-month summation facility-wide emissions of hazardous air pollutants (HAP) shall not exceed 8 tons individual, or 20 tons of any combination of HAPs as a rolling, 12-month summation see b)(2)d.
c.	OAC rule 3745-17-07(A)(1)	visible emissions of particulate from any stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average
d.	OAC rule 3745-17-07(B)(1)	visible emissions of fugitive dust from this emissions unit shall not exceed 20 percent opacity as a 3-minute average
e.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)e.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-07(B)(1).
- b. The hourly and annual particulate emission limitations were established to reflect the controlled potential to emit for this emissions unit. In accordance with the permit application, the permittee has committed to use a dry filtration system with a minimum of 95% capture and 99% control efficiency whenever the emissions unit is in operation for the purpose of ensuring compliance with the particulate emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the usage of a dry filtration system.
- c. The hourly and annual PE and VOC emission limitations were established to reflect the potential to emit for this emissions unit based on the worst case production data provided in the permittee's application. In accordance with the permit application, the permittee has committed to the following:
 - i. maximum dry addition rate of 13,000 lbs per hour for calculating the particulate emissions;

- a. 20 percent opacity from any stack as a 6-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

- b. Emission limitation:

20 percent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

- c. Emission limitation:

1.5 pounds per hour of PE from the stack.

Applicable compliance method:

This emissions limitation was established to reflect the controlled potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (13,000 pounds per hour) by the capture efficiency (0.95), and one minus the control efficiency (1-0.99) and divide the result by 2000 pounds per ton.

If required, compliance shall be demonstrated through stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures of Method 5 of 40 CFR Part 60 Appendix A.

- d. Emission Limitation:

6.6 tons per year of PE from the stack.

Applicable Compliance Method:

This emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 1.5 pounds of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

e. Emission limitation:

6.5 pounds per hour of PE fugitive.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (13,000 pounds per hour) by one minus the capture efficiency (1 - 0.95) and divide the result by 2000 pounds per ton.

f. Emission Limitation:

28.5 tons per year of PE fugitive.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 6.5 pounds of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

g. Emission limitation:

65 pounds per hour of VOC from this emissions unit.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the worst-case operating scenario, as follows:

the emission factor specified in STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005, as follows: multiply the emission factor in pounds of VOC emissions per pound of solvent (worst-case 0.005) by the maximum hourly rate of VOC-containing liquid organic material addition (13,000 pounds).

h. Emission limitation:

39.6 tons per year PE facility-wide from all stacks.

Applicable compliance method:

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

i. Emission limitation:

60 tons per year VOC facility-wide.

Applicable compliance method:

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

j. Emission limitation:

8 tons per year individual HAP facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

k. Emission limitation:

20 tons per year combined HAPs facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

g) Miscellaneous Requirements

(1) None.

8. Emissions Unit Group -similar units: P022, P023

EU ID	Operations, Property and/or Equipment Description
P022	No. 30 MilShar 1
P023	No. 31 MilShar 2

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. None.
- (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. b)(1)b. and B.2. through B.5.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	particulate emissions (PE) from the stack serving this emissions unit shall not exceed 1.5 pounds per hour and 6.6 tons per year fugitive particulate emissions (PE) shall not exceed 6.5 pounds per hour and 28.5 tons per year volatile organic compound emissions (VOC) shall not exceed 65 pounds per hour see b)(2)a. through b)(2)c.

b.	OAC rule 3745-31-05(D)	<p>facility-wide PE from all stacks shall not exceed 39.6 tons as a rolling, 12-month summation</p> <p>facility-wide VOC shall not exceed 60 tons as a rolling, 12-month summation</p> <p>facility-wide emissions of hazardous air pollutants (HAP) shall not exceed 8 tons individual, or 20 tons of any combination of HAPs as a rolling, 12-month summation</p> <p>see b)(2)d.</p>
c.	OAC rule 3745-17-07(A)(1)	visible emissions of particulate from any stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average
d.	OAC rule 3745-17-07(B)(1)	visible emissions of fugitive dust from this emissions unit shall not exceed 20 percent opacity as a 3-minute average
e.	OAC rule 3745-17-08(B), (B)(3)	see b)(2)e.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-17-07(B)(1).
- b. The hourly and annual particulate emission limitations were established to reflect the controlled potential to emit for this emissions unit. In accordance with the permit application, the permittee has committed to use a dry filtration system with a minimum of 95% capture and 99% control efficiency whenever the emissions unit is in operation for the purpose of ensuring compliance with the particulate emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the usage of a dry filtration system.
- c. The hourly and annual PE and VOC emission limitations were established to reflect the potential to emit for this emissions unit based on the worst case production data provided in the permittee's application. In accordance with the permit application, the permittee has committed to the following:
 - i. maximum dry addition rate of 13,000 lbs per hour for calculating the particulate emissions;

- a. 20 percent opacity from any stack as a 6-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

- b. Emission limitation:

20 percent opacity from fugitive sources as a 3-minute average.

Applicable compliance method:

If required, compliance shall be demonstrated through visible emissions readings performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures of Method 9 of 40 CFR Part 60 Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

- c. Emission limitation:

1.5 pounds per hour of PE from the stack.

Applicable compliance method:

This emissions limitation was established to reflect the controlled potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (13,000 pounds per hour) by the capture efficiency (0.95), and one minus the control efficiency (1-0.99) and divide the result by 2000 pounds per ton.

If required, compliance shall be demonstrated through stack testing performed in accordance with OAC rule 3745-17-03(B)(10) using the methods and procedures of Method 5 of 40 CFR Part 60 Appendix A.

- d. Emission Limitation:

6.6 tons per year of PE from the stack.

Applicable Compliance Method:

This emission limitation was established to reflect the controlled potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 1.5 pounds of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

e. Emission limitation:

6.5 pounds per hour of PE fugitive.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 6.4-1, dated 1/95, as follows: multiply the emission factor of 20 pounds of PE emissions per ton by the maximum hourly rate of dry material addition (13,000 pounds per hour) by one minus the capture efficiency (1 - 0.95) and divide the result by 2000 pounds per ton.

f. Emission Limitation:

28.5 tons per year of PE fugitive.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated through calculations performed as follows: multiply the short term emission rate of 6.5 pounds of PE per hour by 8,760 hours per year and divide by 2,000 pounds per ton.

g. Emission limitation:

65 pounds per hour of VOC from this emissions unit.

Applicable compliance method:

This emissions limitation was established to reflect the potential to emit for this emissions unit based on the worst-case operating scenario, as follows:

the emission factor specified in STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005, as follows: multiply the emission factor in pounds of VOC emissions per pound of solvent (worst-case 0.005) by the maximum hourly rate of VOC-containing liquid organic material addition (13,000 pounds).

h. Emission limitation:

39.6 tons per year PE facility-wide from all stacks.

Applicable compliance method:

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

i. Emission limitation:

60 tons per year VOC facility-wide.

Applicable compliance method:

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

j. Emission limitation:

8 tons per year individual HAP facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

k. Emission limitation:

20 tons per year combined HAPs facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

g) Miscellaneous Requirements

(1) None.

9. P025

Operations, Property and/or Equipment Description:

Organic Liquid Repackaging Operation

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. d)(2).
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)c. and B.2. through B.5.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compounds (VOC) emissions shall not exceed 5.5 pounds per hour; and see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-31-05(D)	facility-wide PE from all stacks shall not exceed 39.6 tons as a rolling, 12-month summation facility-wide VOC shall not exceed 60 tons as a rolling, 12-month summation; and

Draft Permit-to-Install and Operate

HA INTERNATIONAL LLC

Permit Number: P0109726

Facility ID: 0448011215

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		facility-wide emissions of hazardous air pollutants (HAP) shall not exceed 8 tons individual, or 20 tons of any combination of HAPs as a rolling, 12-month summation see b)(2)d.
d.	OAC rule 3745-31-05(E)	VOC emissions from this emissions unit shall not exceed 1.1 tons as a rolling, 12-month summation
e.	ORC 3704.03(F)(3)(c) and F(4)	See d)(2).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. The hourly emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limitation.
- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit for VOC is less than 10 tons/year.

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

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

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

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the material transfer rate for each month, in pounds; and
 - b. the rolling, 12-month summation of the material transfer rates, in pounds per year.
- (2) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745 31 requires permittees to apply for and obtain a new or modified federally enforceable permit to install and operate (FEPTIO) prior to making a "modification" as defined by OAC rule 3745 31 01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

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

f) Testing Requirements

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

a. Emission limitation:

5.5 pounds per hour of VOC from this emissions unit.

Applicable compliance method:

This emission limitation was established to reflect the potential to emit for this emissions unit through calculations based on one-third of the emission factor specified in the STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005, as follows: multiply the emission factor in pounds of VOC emissions per pound of material transferred (0.011) by the maximum rate of material transferred (500 pounds of material transferred/hr).

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

b. Emission Limitation:

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

Applicable Compliance Method:

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

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

c. Emission limitation:

39.6 tons per year PE facility-wide from all stacks.

Applicable compliance method:

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

d. Emission limitation:

60 tons per year VOC facility-wide.

Applicable compliance method:

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

e. Emission limitation:

8 tons per year individual HAP facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

f. Emission limitation:

20 tons per year combined HAPs facility-wide.

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of B.4. of this permit.

g) Miscellaneous Requirements

(1) None.