



Environmental Protection Agency

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

Certified Mail

8/15/2012

Mr. TODD PEW
Chromaflo Technologies Corp
P.O. BOX 816
ASHTABULA, OH 44005

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)

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

Facility ID: 0204010285
Permit Number: P0107577
Permit Type: Administrative Modification
County: Ashtabula

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, The Star Beacon. 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	Ohio EPA DAPC, Northeast District Office 2110 East Aurora Road Twinsburg, OH 44087
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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 Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NEDO; Pennsylvania; Canada



Permit Strategy Write-Up

1. Check all that apply: Synthetic Minor Determination Netting Determination
2. Source Description: Administrative modification of (P022) Pigment dispersion mixer/tank #29 (MT029) with a cartridge dust collector DC007 to control particulate emissions.
3. Facility Emissions and Attainment Status: As of 2/26/08 upon final issuance of PTI# 02-22571, the facility accepted restrictions on VOC usage and HAP usage, per rolling 12-month period, to limit the facility-wide potential to emit to 99.9 tons VOC emissions, 9.9 tons each single HAP emissions and 24.9 tons combined HAP emissions per rolling 12-month period.
4. Source Emissions: See "PTE & Limits" page of "Chromflo FEPTIO Project Emissions.xls".

	PE	PE	OC	OC
	lb/hr	ton/yr	lb/day	ton/yr
Revised	0.30	1.31	13.9	2.54
Current	0.05	0.11	13.9	0.75 ^A
Net Change	0.25	1.20	0.0	1.79

Note A – Current OC limit in PTI 02-10474 is 0.75 ton OC per 12-month rolling period to limit OCs. There is no practical restriction to limit VOC/OC, so PTI 02-10474 is not federally enforceable. Revised BAT of 2.54 tons OC/year is based on 13.9 lbs OC/day limit over 365 days/year, without restrictions.

Note B – Other BAT requirement in current PTI 02-10474 is use of a PE control device with a minimum 99% efficiency from dust control device DC007. Use of a control is considered physically inherent since it is needed for worker safety. The revised BAT is based on the maximum, controlled PE rate (potential) multiplied by 120% for a conservative estimate. The applicant requested differential pressure drop monitoring instead of a periodic check on the VE.

5. Conclusion: The applicant has not physically changed the process operation. The revised potential PE estimates are greater than the current allowable limits. Since the net changes are potential increases of less than 10 lbs/day (net change <0.42 lb/hr), a de minimis threshold, the operational change does not meet the definition of a Chapter 31 modification as defined in OAC rule 3745-31-01(QQQ), so the application can be processed as an administrative modification instead of a Chapter 31 modification.
6. Please provide additional notes or comments as necessary: The rolling 12-month OC emission limit for P022 will be removed, since it does not directly limit VOCs or HAPs and is a record keeping burden. The facility has agreed to include P022 in the facility-wide VOC and HAP usage restrictions; see terms B2. through B.13.

Please process renewal PTIO P0105412 for 19 emissions units at the same time as this permit.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	1.31
OC	2.54

PUBLIC NOTICE

8/15/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Chromaflo Technologies Corp

2600 MICHIGAN AVE,

Ashtabula, OH 44004

Ashtabula County

FACILITY DESC.: Paint and Coating Manufacturing

PERMIT #: P0107577

PERMIT TYPE: Administrative Modification

PERMIT DESC: Administrative modification to remove 12-month rolling limits of OC materials usage and 0.75 ton OC emissions for P022 so that it can be subject to facility-wide VOC & HAP emissions limits and materials usage restrictions instead.

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/permitsonline.aspx> by entering the permit # or: Christine McPhee, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Chromaflo Technologies Corp**

Facility ID:	0204010285
Permit Number:	P0107577
Permit Type:	Administrative Modification
Issued:	8/15/2012
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
Chromaflo Technologies Corp

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Authorization

Facility ID: 0204010285
 Application Number(s): A0038114, A0038858
 Permit Number: P0107577
 Permit Description: Administrative modification to remove 12-month rolling limits of OC materials usage and 0.75 ton OC emissions for P022 so that it can be subject to facility-wide VOC & HAP emissions limits and materials usage restrictions instead.
 Permit Type: Administrative Modification
 Permit Fee: \$250.00 *DO NOT send payment at this time, subject to change before final issuance*
 Issue Date: 8/15/2012
 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:

Chromaflo Technologies Corp
 2600 MICHIGAN AVE
 Ashtabula, OH 44004

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:

Ohio EPA DAPC, Northeast District Office
 2110 East Aurora Road
 Twinsburg, OH 44087
 (330)425-9171

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: P0107577

Permit Description: Administrative modification to remove 12-month rolling limits of OC materials usage and 0.75 ton OC emissions for P022 so that it can be subject to facility-wide VOC & HAP emissions limits and materials usage restrictions instead.

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

Emissions Unit ID:	P022
Company Equipment ID:	MT029
Superseded Permit Number:	02-10474
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 Ohio EPA DAPC, Northeast District Office 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.13

2. Federally Enforceable Permit to Install and Operate P0107577 for this air contaminant source takes into account the following voluntary restrictions, regarding the emissions units specified in 3. and 4., as proposed by the permittee for the purpose of avoiding the Lowest Achievable Emissions Rate (LAER) and Emissions Offset requirements under OAC rules 3745-31-21 through 3745-31-27 as well as avoiding Title V requirements under OAC rules 3745-77-02 through 3745-77-11:
 - a) The emissions of volatile organic compounds (VOC) from the emissions units specified in B.3 and B.4 shall not exceed 99.9 tons/year, based on a rolling, 12-month summation of the monthly emissions, and shall be achieved by restricting the maximum cumulative usage of materials from the emissions units specified in B.3 to 6,133,613 gallons of VOC per year, based upon a rolling, 12-month summation.
 - b) The emissions of each individual hazard air pollutant (HAP) from the emissions units specified in B.3 and B.4 shall not exceed 9.9 tons/year, based on a rolling, 12-month summation of the monthly emissions, and shall be achieved by restricting the maximum cumulative usage of materials from the emissions units specified in B.3 to 604,170 gallons of each individual HAP per year, based upon a rolling, 12-month summation.
 - c) The emissions of total combined HAP from the emissions units specified in B.3 and B.4 shall not exceed 24.9 tons/year based on a rolling, 12-month summation of the monthly emissions, and shall be achieved by restricting the maximum cumulative usage of materials from the emissions units specified in B.3 to 1,784,498 gallons of total combined HAPs based on a rolling, 12-month summation.

In lieu of VOC, individual HAP, and total combined HAP content limitations due to the large number of different content values of the different products produced, the permittee shall show compliance with B.2.a) through B.2.c) by using the methods described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" and the record keeping requirements listed in B.8 and B.9 and the support document in the application for air permit to install number 02-22571. Therefore, compliance with the emissions limitations in B.2.a) through B.2.c) is assumed as long as the permittee does not manufacture an intermediate product or a product that results in more emissions than the "worst case", presented in the application for air permit to install number 02-22571 and its supporting documentation, which includes the number of gallons processed, as listed in B.5 through B.7.

3. Voluntary restrictions to limit potential facility-wide emissions of VOC, individual HAP and total combined HAP concern the following emissions units:
- a) P001 - Pigment dispersion high shear mixer #1 (MX001) in the white area;
 - b) P006 - Hockmeyer HVR-50 high shear pigment dispersion mixer #9 (MX009) in the mix area;
 - c) P008 - High shear pigment dispersion mixer #11 (MX011) in the mix area;
 - d) P013 - Hockmeyer HVR-30 high shear pigment dispersion mixer #12 (MX012) in the mix area;
 - e) P015 - Pigment dispersion mixer #14 (MX014) in the mix area;
 - f) P019 - 750 Gallon low intensity pigment dispersion mixer/tank #24 (MT024) in the mix area;
 - g) P020 - Pigment dispersion paddle pot/tank #25 (MT025) in the mix area;
 - h) P022 - Pigment dispersion mixer/tank #29 (MT 029) in the mix area;
 - i) P023 - Pigment dispersion/chemical dispersion high sheer mixer no. 16 (MX016) in the mix area;
 - j) P024 - Pigment dispersion mixer #19 (MX019) in the mix area;
 - k) P030 - Pigment dispersion mixer #10 (MX010) in the mix area;
 - l) P031 - Pigment dispersion mixer #7 (MX007) in the white area;
 - m) P032 - Pigment dispersion mixer #20 (MX032) in the mix area;
 - n) P033 - Pigment dispersion mixer no. 22 (MX022) in the solvent area;
 - o) P034 - Pigment dispersion sand mill no. 12 (SM012) in the solvent area;
 - p) P035 - Pigment dispersion sand mill no. 18 (SM018) in the solvent area;
 - q) P036 - Pigment dispersion sand mill no. 19 (SM019) in the solvent area; and
 - r) P037 - Pigment dispersion products packaging line.
4. The following emissions units located at this facility, including any de minimis air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exempt air contaminant sources installed subsequent to the issuance of this permit are subject to the rolling, 12-month emissions limitation(s) on VOC, individual HAP and total combined HAP in B.2.a through B.2.c, but do not have operational restrictions for VOC or HAP usages:
- a) P004 – Hockmeyer HVR-2 mixer (MX006) in lab area;
 - b) P005 – Hockmeyer HVR-50 mixer (MX008) in mill area;
 - c) P014 – 500 Liter high intensity mixer (HT005) in HIT area;
 - d) P017 – High intensity mixer (HT003) in HIT area;

- e) P018 – 750 Gallon low intensity mixer (MT023) in DIN area;
- f) P021 – Pigment dispersion/chemical dispersion high sheer mixer (MX015) in blend area;
- g) P026 – 2-roll mill (RM009) in CHIP area;
- h) P027 – Hockmeyer CMX-100 pot washer (PW004) in the CAB area;
- i) P028 - Solvated cellulose acetate butyrate (CAB) production in the CAB area;
- j) P038 - Pigment dispersion high shear mixer (MX004);
- k) P039 - Pigment dispersion high shear mixer (MX002);
- l) P040 - Pigment dispersion mixer (MX003) in blend area;
- m) P041 - Pigment dispersion mixer (MX005) in blend area;
- n) P042 - Pigment dispersion mixer/tank (MT030) with a dust control (DC007);
- o) P043 - Pigment dispersion mixer/tank (MT033) with a dust control (DC007);
- p) P046 – Dry inhibitor packaging line (DIN PKG) with scale no. SC044 and a dust control (DC002);
- q) P047 - Pigment dispersion roll mill (RM008) with a dust control (DC005);
- r) P048 - Pigment dispersion roll mill (RM011) with a dust control (DC005);
- s) P049 - Pigment dispersion mixer (MX017) with a dust control (DC003);
- t) P050 - Pigment dispersion mixer (MX018) with a dust control (DC003);
- u) P051 – Pigment dispersion pail line (PLINE1) in the packaging area;
- v) P052 – Pigment dispersion pail line (PLINE2) in the packaging area;
- w) P053 – Pigment dispersion drum line (DLINE1) in the packaging area;
- x) P054 – Pigment dispersion pail line (DLINE2) in the packaging area;
- y) P055 – Pigment dispersion tote (TLINE) packaging line in the packaging area;
- z) P056 – Pigment dispersion FFS (FFS) packaging line in the packaging area;
- aa) P057 - Pigment dispersion SUP (SUP) packaging line in the packaging area;
- bb) P058 - Pigment dispersion mixer (MX021) in the mill area;
- cc) P059 - Pigment dispersion roll mill (RM001) in the mill area;
- dd) P060 - Pigment dispersion roll mill (RM002) in the mill area;



- ee) P061 - Pigment dispersion roll mill (RM003) in the mill area;
- ff) P062 - Pigment dispersion roll mill (RM007) in the mill area;
- gg) P063 - Pigment dispersion sand mill (SM008) in the mill area;
- hh) P064 - Pigment dispersion sand mill (SM002) in the mill area;
- ii) P065 - Pigment dispersion sand mill (SM005) in the mill area;
- jj) P066 - Pigment dispersion sand mill (SM001) in the mill area;
- kk) P067 - Pigment dispersion sand mill (SM022) in the mill area;
- ll) P068 - Pigment dispersion sand mill (SM009) in the mill area;
- mm) P069 - Pigment dispersion sand mill (SM007) in the mill area;
- nn) P070 - Pigment dispersion sand mill (SM034) in the mill area;
- oo) P071 - Pigment dispersion sand mill (SM033) in the mill area;
- pp) P072 - Pigment dispersion sand mill (SM026) in the mill area;
- qq) P073 - Pigment dispersion sand mill (SM016) in the mill area;
- rr) P074 - Pigment dispersion sand mill (SM014) in the mill area;
- ss) P075 - Pigment dispersion sand mill (SM015) in the mill area;
- tt) P076 - Pigment dispersion sand mill (SM023) in the mill area;
- uu) P077 - Pigment dispersion sand mill (SM017) in the mill area;
- vv) P078 - Pigment dispersion sand mill (SM030) in the mill area;
- ww) P079 - Pigment dispersion sand mill (SM031) in the mill area;
- xx) P080 - Pigment dispersion covered basket sand mill (SM024) in the solvent area;
- yy) P081 - Pigment dispersion covered basket sand mill (SM004) in the solvent area;
- zz) P082 - Pigment dispersion covered basket sand mill (SM006) in the solvent area;
- aaa) P083 - Pigment dispersion covered basket sand mill (SM035) in the solvent area;
- bbb) P084 - Pigment dispersion covered basket sand mill (SM003) in the solvent area;
- ccc) P085 - Pigment dispersion covered basket sand mill (SM036) in the solvent area;
- ddd) P086 - Pigment dispersion sand mill no. 38 (covered basket-mill), solvent area;
- eee) P087 - Pigment dispersion sand mill no. 39 (covered basket-mill), solvent area;



- fff) T001 - 6,000 Gallon storage tank no. 28 for unsaturated polyester resin;
- ggg) T006 - 8,800 Gallon storage tank no. 18 for unsaturated polyester resin;
- hhh) T007 - 8,800 Gallon storage tank no. 17 for unsaturated polyester resin;
- iii) T008 - 8,800 gallon storage tank no. 16 for unsaturated polyester resin;
- jjj) T009 - 8,800 gallon storage tank no. 12 for unsaturated polyester resin;
- kkk) T010 - 8,800 gallon storage tank no. 13 for polyester polyol;
- lll) T011 - 8,800 gallon storage tank no. 14 for polyester resin/styrene;
- mmm) T012 - 8,800 gallon storage tank no. 15 for polyester resin/styrene;
- nnn) T013 - 12,000 gallon storage tank no. 11 for styrene monomer;
- ooo) T014 - 8,800 gallon storage tank no. 27 for unsaturated polyester resin;
- ppp) T015 - 6,000 gallon holding tank no. 1 for wastewater;
- qqq) T016 - 8,800 gallon storage tank no. 26 for polyester resin/styrene;
- rrr) T017 - 8,800 gallon storage tank no. 19 for polyester resin/styrene; and
- sss) T018 - 8,800 gallon storage tank no. 20 for polyester resin/styrene.

Operational Restrictions

- 5. The maximum annual usage of VOC materials for the emissions units specified in B.3 shall not exceed 6,133,613 gallons, based upon a rolling, 12-month summation of the usage from production and cleanup materials.
- 6. The maximum annual usage of individual HAP materials for the emissions units specified in B.3 shall not exceed 604,170 gallons, based upon a rolling, 12-month summation of the usage from production and cleanup materials.
- 7. The maximum annual usage of total combined HAP materials for the emissions units in B.3 shall not exceed 1,784,498 gallons, based upon a rolling, 12-month summation of the usage from production and cleanup materials.

Monitoring & Record Keeping Requirements

- 8. The permittee shall calculate and maintain monthly records of the following information for production and cleanup materials employed at the emissions units identified in B.3:
 - a) the VOC emissions and the rolling, 12-month emissions of VOC, in tons;
 - b) the emissions of each individual HAP and the rolling, 12-month emissions of each individual HAP, in tons; and



- c) the total combined HAP emissions and the rolling, 12-month emissions of total combined HAP, in tons.
9. The permittee shall maintain monthly records of the following information for production and cleanup materials employed at the emissions units identified in B.3:
- a) the VOC materials usage from production and cleanup materials;
 - b) the rolling, 12-month summation of the VOC materials usage;
 - c) each of the individual HAP materials usage from production and cleanup materials;
 - d) the rolling, 12-month summation of each individual HAP materials usage;
 - e) the total combined HAP materials usage from production and cleanup materials; and
 - f) the rolling, 12-month summation of the total combined HAP materials usage.

Reporting Requirements

10. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a) 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:
 - (1) all exceedances of the VOC emission limitation of 99.9 tons as a rolling, 12-month summation from the emissions units specified in B.3 and B.4;
 - (2) all exceedances of the individual HAP emission limitation of 9.9 tons as a rolling, 12-month summation from the emissions units specified in B.3 and B.4;
 - (3) all exceedances of the total combined HAP emission limitation of 24.9 tons as a rolling, 12-month summation, from the emissions units specified in B.3 and B.4;
 - (4) all exceedances of the VOC materials usage limitation of 6,133,613 gallons as a rolling, 12-month summation from the emissions units specified in B.3;
 - (5) all exceedances of the individual HAP materials usage limitation of 604,170 gallons as a rolling, 12-month summation from the emissions units specified in B.3; and
 - (6) all exceedances of the total combined HAP materials usage limitation of 1,784,498 gallons as a rolling, 12-month summation from the emissions units specified in B.3.
 - b) the probable cause of each deviation (excursion);
 - c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d) the magnitude and duration of each deviation (excursion).



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.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Northeast District Office).

Testing Requirements

11. Compliance with the allowable emission limitations in B.2 of these terms and conditions shall be determined in accordance with the following methods:

a) Emission Limitations:

The emissions of VOC from the emissions units specified in B.3 and B.4 shall not exceed 99.9 tons/year, based on a rolling, 12-month summation of the monthly emissions.

The emissions of each individual HAP from the emissions units specified in B.3 and B.4 shall not exceed 9.9 tons/year, based on a rolling, 12-month summation of the monthly emissions.

The emissions of total combined HAP from the emissions units specified in B.3 and B.4 shall not exceed 24.9 tons/year based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance may be based on the following:

For emissions units specified in B.3, that are subject to the voluntary restrictions for VOC and HAP usages in B.5 through B.7, the record keeping requirements in B.9 and maintenance of a rolling, 12-month summation of the specified emissions, required in B.8.

For emissions units specified in B.4, that are not subject to the voluntary restrictions for VOC and HAP usages, VOC emissions may be estimated by using the methods described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities or an alternative method as approved by the Ohio EPA.

12. The methods and procedures specified in 40 CFR Part 60, Appendix A, Method 24 or formulation data shall be used to determine the VOC content of production and cleanup materials. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
13. The methods and procedures specified in 40 CFR Part 63, Appendix A, Method 311 or formulation data shall be used to determine the HAP content of production and cleanup materials. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

Miscellaneous Requirements

14. The emissions units at this plant are involved in the manufacture of pigment dispersions. The permittee does not produce coatings, as defined in 40 CFR 63.8105, and is therefore not subject to the New Emissions Standards for Hazardous Air Pollutants for Miscellaneous Coating Manufacturing, 40 CFR Part 63, Subpart HHHHH.

C. Emissions Unit Terms and Conditions



1. P022, MT029

Operations, Property and/or Equipment Description:

Pigment dispersion mixer no. 29 with a fabric filter (DC007) to control particulate emissions

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. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) as effective 11/30/01 as established in PTI# 02-10474 as administratively modified in PTIO# P0107577	Particulate emissions (PE) shall not exceed 0.30 lb/hr and 1.31 tons/year. Organic compound (OC) emissions shall not exceed 13.9 lbs/day and 2.54 tons/year. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A). See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. See b)(2)a.
c.	OAC rule 3745-17-11(B)	The PE limitation required by this applicable rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(D)(1)(b) - voluntary restriction to avoid Lowest Achievable Emissions Rate (LAER), Emissions Offset, and Title V requirements	See B.2 through B.13.

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a baghouse (e.g. fabric filter DC007) with a minimum control efficiency of 99%, by weight, for PE at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

Dust Collector

- (1) The permittee shall maintain records that document any time periods when the baghouse was not in service when this emissions unit was in operation.
- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 3 to 10 inches of water.
- (3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis.

The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and

- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

Production and Cleanup Materials

- (4) The permittee shall collect and record the following information for each day for the production operations and the cleanup operations:
 - a. the name and/or identification number of each material;
 - b. the weight of each material, in pounds;
 - c. the specific gravity, in grams/ml, or the density, in lbs/gal, of each material;
 - d. the OC content of each material employed, in percent by weight; and
 - e. the total OC emissions rate for all production materials and cleanup materials, in pounds per day, in accordance with the method(s) specified in f)(1)d.

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 PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.
- (2) The permittee shall identify in the annual PER the following information during the 12-month reporting period for this emissions unit:

Dust Collector

- a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
- b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the baghouse;

Production and Cleanup Materials

- c. an identification of each day during which the OC emissions from the production materials and cleanup materials exceeded 13.9 pounds per day;
- d. the magnitude of each daily OC emissions limit deviation (excursion);

Dust Collector, and Production and Cleanup Materials

- e. each incident of deviation described in “a” and “b” (above) where a prompt investigation was not conducted;
- f. each incident of deviation described in “a”, “b” and “c” where prompt corrective action, that would bring the emissions unit into compliance, was determined to be necessary and was not taken; and
- g. each incident of deviation described in “a”, “b” and “c” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance shall be demonstrated through visible emissions observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

PE shall not exceed 0.30 lb/hr.

Applicable Compliance Method:

Compliance may be based on the following equation:

$$PE(HR) = PWR \times \text{Solids} \times EF \times (1 - CE)$$

where:

PE(HR) = maximum, controlled hourly PE rate, which is 0.25 lb/hr;

PWR = maximum process weight rate, which is 1250 lbs/hr of materials processed, as an average of a batch process, as specified in the application for this PTIO;

Solids = solids content, which is 0.50 lb solids/lb materials processed, as specified in the application for this PTIO;

EF = emissions factor, which is 20 lbs uncontrolled PE/2,000 lbs solids, as found in Table 6.4-1, AP-42 Chap. 6.4 (5/83); and

CE = control efficiency of the dust collector (baghouse) control device, which is 0.99 as specified in the application for this PTIO.

If required pursuant to OAC rule 3745-15-04(A), the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 or equivalent, alternative method(s), as approved by Ohio EPA.

c. Emission Limitation:

PE shall not exceed 1.31 tons/year.



Applicable Compliance Method:

Compliance may be based on the following equation:

Determination of the maximum, controlled, annual emissions may be made by the following equation:

$$PE(YR) = PE (HR) \times Hrs/yr \times 2,000 \text{ lbs/ton}$$

where:

PE(YR) = maximum emissions, in tons/yr, which is estimated to be 1.10 tons PE/yr;

PE(HR) = maximum, hourly controlled pollutant emissions, in lbs/hr, as specified in f)(1)b; and

Hrs/yr = the maximum annual operating hours, which is 8,760 hrs/yr.

d. Emission Limitation:

OC emissions shall not exceed 13.9 lbs/day.

Applicable Compliance Method:

Compliance may be based on the following equation(s):

i. Determination of potential emissions from all operations:

$$OC(DAY) = (EF \text{ OC_LOAD} + EF \text{ OC_MIX}) \times \text{Batch/day}$$

where:

OC(DAY) = potential, daily OC emissions rate, in lbs/day;

EF OC_LOAD = OC emissions factor from loading OC materials to a mix vessel, in lb OC/batch, as determined from the equation in f)(1)d.ii;

EF OC_MIX = OC emissions factor from mixing all materials in a mix vessel, in lb OC/batch, as determined from the equations in f)(1)d.iii and f)(1)d.iv; and

Batch/day = the maximum daily quantity of batches.

ii. Determination of the OC emissions factor from materials loading:

$$EF \text{ OC_LOAD} = 12.46 \times S \times P \times M \times Q/T \times Hrs/Batch \times (1 - CE)$$

where:

EF OC_LOAD = OC emissions factor, lbs OC/batch, from equation 8.4-1, p. 8.4-4, section 4.1, EIIP (Emission Inventory Improvement Program),

Vol. II, Chap. 8 Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities (2/05);

12.46 = equilibrium constant, °R/(psia x lb/lb-mole x 1,000 gal.);

S = saturation factor, dimensionless, see AP-42 Table 5.2-1, 1.45 for splash loading;

P = vapor pressure of material, in psia;

M = weighted average vapor molecular weight, lb/lb-mole;

Q = maximum volume of material loaded/hour, specified volume gal/1,000 gal;

T = temperature of loaded material, °R, specified temperature in °F + 460;

Hrs/Batch = maximum hours of the loading operation; and

CE = control efficiency of any capture or control device, if applicable.

- iii. Determination of the gas phase mass transfer coefficient to estimate emissions from surface evaporation during mixing:

$$K = 0.00438 \times U^{0.78} \times (18/M)^{1/3}$$

where:

K = gas phase mass transfer coefficient for OC species, ft/sec, from equation 8.4-21, p. 8.4-20, section 4.4, EIIP (Emission Inventory Improvement Program), Vol. II, Chap. 8 Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities (2/05);

U = wind speed, miles/hr, 0.1 miles/hr; and

M = average weighted vapor molecular weight, lb/lb-mole.

- iv. Determination of the OC emissions factor from surface evaporation during mixing:

$$EF_{OC_MIX} = M \times K \times A \times P \times 3600 / (R \times T) \times \text{Batch/Hrs}$$

where:

EF_{OC_MIX} = OC emissions factor, lbs OC/batch, from equation 8.4-22, p. 8.4-22, section 4.4, EIIP (Emission Inventory Improvement Program), Vol. II, Chap. 8 Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities (2/05);

M = vapor molecular weight, lb/lb-mole;

A = surface area of exposure or opening of conservation vent, ft²;

P = vapor pressure of material, psia;

3600 = 3600 sec/hr;

R = universal gas constant at 1 atmosphere of pressure, 10.73 psia x ft³/(°R x lb-mole);

T = maximum temperature of loaded material, °R, specified temperature °F + 460; and

Hrs = Maximum hours of the mixing and/or milling operation(s).

If required pursuant to OAC rule 3745-15-04(A), the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 18, 21, 24 or 25 or equivalent, alternative method(s), as approved by Ohio EPA.

e. Emission Limitation:

OC emissions shall not exceed 2.54 tons/year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the summation of the daily OC emissions from the record keeping requirements specified in d)(4) for a calendar year, divided by 2,000 lbs/ton.

g) **Miscellaneous Requirements**

- (1) Cartridge dust collector DC007 also controls particulate emissions from the following emissions units: P006, P008, P013, P015, P019, P020, P022, P023, P024, P028, P030, P032, P042 and P043.
- (2) This emissions unit does not get cleaned between each batch as it is dedicated to certain products.