



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

12/11/2012

Thomas Tuckerman
MANSFIELD PAINT CO
525 West Liberty Street
Medina, OH 44256

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1652050182
Permit Number: P0111993
Permit Type: Renewal
County: Medina

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

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

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Akron Regional Air Quality Management District at (330)3752480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: ARAQMD



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
MANSFIELD PAINT CO**

Facility ID:	1652050182
Permit Number:	P0111993
Permit Type:	Renewal
Issued:	12/11/2012
Effective:	12/11/2012
Expiration:	12/11/2022



Division of Air Pollution Control
Permit-to-Install and Operate
for
MANSFIELD PAINT CO

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	11
1. Emissions Unit Group - Paint Manufacturing Line: P001, P002, P003, P004, P006, P007, P008, P009, P010, P011, P012, P014.....	12



Final Permit-to-Install and Operate
MANSFIELD PAINT CO
Permit Number: P0111993
Facility ID: 1652050182
Effective Date: 12/11/2012

Authorization

Facility ID: 1652050182
Application Number(s): A0046138
Permit Number: P0111993
Permit Description: Renewal PTIO for the manufacture of custom designed coatings.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 12/11/2012
Effective Date: 12/11/2012
Expiration Date: 12/11/2022
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

MANSFIELD PAINT CO
525 W LIBERTY ST
MEDINA, OH 44258

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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: P0111993

Permit Description: Renewal PTIO for the manufacture of custom designed coatings.

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

Group Name: Paint Manufacturing Line

Emissions Unit ID:	P001
Company Equipment ID:	High Speed Mixer #1
Superseded Permit Number:	16-02279
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	High Speed Dispenser #2
Superseded Permit Number:	16-02279
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	Plant Mill #1
Superseded Permit Number:	16-02279
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	Plant Mill #2
Superseded Permit Number:	16-02279
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	Small Paste Mill
Superseded Permit Number:	16-02279
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	Large Mixer #1
Superseded Permit Number:	16-02279
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P008
Company Equipment ID:	Large Mixer #2
Superseded Permit Number:	16-02279
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	Large Mixer #3
Superseded Permit Number:	16-02279
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P010
Company Equipment ID:	Large Mixer #4
Superseded Permit Number:	16-02279
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	Small Mixer #1
Superseded Permit Number:	16-02279
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P012
Company Equipment ID:	Small Mixer #2
Superseded Permit Number:	16-02279
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
MANSFIELD PAINT CO
Permit Number: P0111993
Facility ID: 1652050182
Effective Date: 12/11/2012

Emissions Unit ID:	P014
Company Equipment ID:	Fill Station #1
Superseded Permit Number:	16-02279
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
MANSFIELD PAINT CO
Permit Number: P0111993
Facility ID: 1652050182
Effective Date: 12/11/2012

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 Akron Regional Air Quality Management District 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.

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



Final Permit-to-Install and Operate
MANSFIELD PAINT CO
Permit Number: P0111993
Facility ID: 1652050182
Effective Date: 12/11/2012

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.



Final Permit-to-Install and Operate
MANSFIELD PAINT CO
Permit Number: P0111993
Facility ID: 1652050182
Effective Date: 12/11/2012

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

MANSFIELD PAINT CO

Permit Number: P0111993

Facility ID: 1652050182

Effective Date: 12/11/2012

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) None.
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR part 63 Subpart CCCCCC, National Emissions Standards for Hazardous Air Pollutants: Area Source Standards for Paints and Allied Products Manufacturing. 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.



Final Permit-to-Install and Operate
MANSFIELD PAINT CO
Permit Number: P0111993
Facility ID: 1652050182
Effective Date: 12/11/2012

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - Paint Manufacturing Line: P001, P002, P003, P004, P006, P007, P008, P009, P010, P011, P012, P014

EU ID	Operations, Property and/or Equipment Description
P001	High Speed Mixer #1
P002	High Speed Dispenser #2
P003	Plant Mill #1
P004	Plant Mill #2
P006	Small Paste Mill
P007	Large Mixer #1
P008	Large Mixer #2
P009	Large Mixer #3
P010	Large Mixer #4
P011	Small Mixer #1
P012	Small Mixer #2
P014	Fill Station #1

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) (PTI 16-02279)	For emissions units P001 and P007 through P010: Organic compound (OC) emissions from each emissions unit shall not exceed 0.80 pounds per hour, 19 pounds per day and 3.5 tons per year.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>For emissions unit P002: OC emissions unit shall not exceed 0.19 pounds per hour, 4.5pounds per dayand 0.82tons per year.</p> <p>For emissions unit P003: OC emissions shall not exceed 0.38 pounds per hour, 9pounds per dayand1.6tons per year.</p> <p>For emissions unit P004: OC emissions shall not exceed 0.28 pounds per hour, 6.8pounds per dayand1.2tons per year.</p> <p>For emissions unit P006: OC emissions shall not exceed 0.02 pounds per hour, 0.5pounds per dayand0.1tons per year.</p> <p>For emissions units P011 and P012: OC emissions from each emissions unit shall not exceed 0.27 pounds per hour, 6.4pounds per dayand1.2tons per year.</p> <p>For emissions unit P014: OC emissions shall not exceed 0.86 pounds per hour, 21pounds per dayand3.7tons per year.</p> <p>Visible particulate emissions from the stack serving this emissions unit shall not exceed 10 percent opacity as a six-minute average.</p> <p>There shall be no visible particulate emissions from building ventilation.</p> <p>Particulate emissions (PE) shall not exceed 0.1 pounds per hour and 0.4 tons per year (fabric filter stack emissions).</p> <p>See b(2), (c)(1) and (c)(2) below.</p>
b.	OAC rule 3745-17-07(A) OAC rule 3745-17-07(B) OAC rule 3745-17-08(B) OAC rule 3745-17-11(B)	The emissions limitations specified by these rules are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).



(2) Additional Terms and Conditions

- a. The PE and OC emissions limits regulated per OAC rule 3745-31-05(A)(3) are based upon accepted U.S. EPA potential to emit procedures for this emissions unit. Therefore, no associated record keeping or reporting are required to demonstrate compliance with these emissions limits.

However, if any proposed change(s), such as with production capacity, operating procedures, process materials, emission control equipment, or anything else that increase(s) the potential to emit, then the permittee shall apply for and obtain either a modification to the permit to install or a new final permit to install prior to the change(s).

- b. The permittee shall properly install (or have properly installed), adjust, operate, and maintain a fabric filter system (or comparable air pollution control device), and associated control equipment (i.e., hoods, enclosures, ductwork, and fans, etc.), and any other equipment necessary to capture, contain, and vent air emissions of particulate matter to the air pollution control device serving these emissions units, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- c. Scrap process materials shall be properly disposed of, and any spillage of resin dust from the emissions unit, or cleaning/maintenance of the fabric filter system and associated control equipment shall be promptly cleaned up to reduce the risk of fugitive dust emissions. Also, general housekeeping shall be performed in the facility, as needed, to minimize or eliminate emissions of fugitive dust.
- d. The permittee shall properly install (or have properly installed), adjust, operate, and maintain a closed-lid design for these emissions units to contain and limit OC emissions, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.
- e. The permittee shall store all raw and waste materials in closed containers with tightly fitted covers.

c) Operational Restrictions

- (1) The fabric filter system and associated control equipment serving this emissions unit shall be employed at all times the emissions unit is in operation.
- (2) The closed-lid design serving these emissions units shall be employed with the lid closed at all times the emissions units are in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall document all times the fabric filter system and/or associated control equipment serving this emissions unit were/was not employed when the emissions units were in operation.



- (2) The permittee shall document all times the closed-lid design serving these emissions units was not employed or was not employed with the lid closed when the emissions units were in operation.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the fabric filter system(s) and/or associated control equipment serving these emissions units was not in service when the emissions units were in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
- (2) The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record in which the closed-lid design serving these emissions units was not in service or the lid was not closed when the emissions units were in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.
- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(3) above:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

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. Emissions Limitation:

Visible particulate emissions from the stack shall not exceed 10 percent opacity as a six-minute average; and there shall be no visible particulate emissions from building ventilation.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emissions Limitations:

Particulate emissions (PE) from the fabric filter stack shall not exceed 0.1 pounds per hour and 0.4 tons per year.

Applicable Compliance Method:

The above particulate emissions (PE) limitations were established as specified in the equations below:

$$H = VO(60 \text{ minutes/hour})(1 \text{ pound}/7000 \text{ grains});$$

$$Y = H(8760 \text{ hours/year})(1 \text{ ton}/2000 \text{ pounds});$$



Where,

H = 0.1 lb/hr of PM [hourly controlled potential emissions];

Y = 0.4 TPY of PM [yearly controlled potential emissions];

V = 996 DSCFM [maximum fabric filter system exhaust flow]; and

O = 0.01 grain of PM/DSCF [assumed maximum outlet loading of fabric filter system].

DSCFM = dry standard cubic feet per minute

If required, compliance shall be determined in accordance with the requirements in 40 CFR Part 60, Appendix A, Method 5 and the methods and procedures specified in OAC rule 3745-17-03(B)(10).

c. Emissions Limitations:

For emissions units P001 and P007 through P010: OC emissions from each emissions unit shall not exceed 0.80 pounds per hour, 19 pounds per day and 3.5 tons per year.

For emissions unit P002: OC emissions shall not exceed 0.19 pounds per hour, 4.5 pounds per day and 0.82 tons per year.

For emissions unit P003: OC emissions shall not exceed 0.38 pounds per hour, 9 pounds per day and 1.6 tons per year.

For emissions unit P004: OC emissions shall not exceed 0.28 pounds per hour, 6.8 pounds per day and 1.2 tons per year.

For emissions unit P006: OC emissions shall not exceed 0.02 pounds per hour, 0.5 pounds per day and 0.1 tons per year.

For emissions units P011 and P012: OC emissions from each emissions unit shall not exceed 0.27 pounds per hour, 6.4 pounds per day and 1.2 tons per year.

For emissions unit P014: OC emissions shall not exceed 0.86 pounds per hour, 21 pounds per day and 3.7 tons per year.

Applicable Compliance Method:

The above OC emissions limitations were established as specified in the equations below:

H = PSE;

D = H(24 hours/day);

Y = H(8760 hours/year)(1 ton/2000 pounds);



Where,

H = hourly potential emissions;

D = daily potential emissions;

Y = yearly potential emissions;

P = maximum production rate;

S = lb solvent used in production/lb production; and

E = lb OCs emitted/lb solvent used in production.

If required, compliance shall be determined in accordance with the requirements in Methods 1 through 4 and Method 25 or 25A of 40 CFR Part 60, Appendix A and the methods and procedures specified in OAC rule 3745-21-10(C).

g) **Miscellaneous Requirements**

- (1) 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 a permittee to apply for and obtain a new or modified permit-to-install and operate (PTIO) 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 PTIO.