



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

1/14/2013

Thomas Yurick
PPG Industries - Delaware
760 Pittsburgh Dr.
Delaware, OH 43015

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0121010005
Permit Number: P0112131
Permit Type: Administrative Modification
County: Delaware

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
No	MAJOR GHG
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 (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. 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 PTI 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/pemitsurvey.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 Ohio EPA DAPC, Central District Office at (614)728-3778 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: U.S. EPA
Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
PPG Industries - Delaware**

Facility ID: 0121010005
Permit Number: P0112131
Permit Type: Administrative Modification
Issued: 1/14/2013
Effective: 1/14/2013



Division of Air Pollution Control
Permit-to-Install
for
PPG Industries - Delaware

Table of Contents

Authorization	1
A. Standard Terms and Conditions	4
1. Federally Enforceable Standard Terms and Conditions	5
2. Severability Clause	5
3. General Requirements	5
4. Monitoring and Related Record Keeping and Reporting Requirements.....	6
5. Scheduled Maintenance/Malfunction Reporting	7
6. Compliance Requirements	7
7. Best Available Technology	8
8. Air Pollution Nuisance	8
9. Reporting Requirements	8
10. Applicability	9
11. Construction of New Sources(s) and Authorization to Install	9
12. Permit-To-Operate Application	10
13. Construction Compliance Certification	10
14. Public Disclosure	10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	11
16. Fees.....	11
17. Permit Transfers	11
18. Risk Management Plans	11
19. Title IV Provisions	11
B. Facility-Wide Terms and Conditions.....	12
C. Emissions Unit Terms and Conditions	14
1. P508, Volumetric Machine Fill #3.....	15
2. Emissions Unit Group -High Speed Dispersers #2: P109,P110,P459,P460,	18
3. Emissions Unit Group -Lab Spray Booths: K006,K007,	26
4. Emissions Unit Group -Resin Reactors: P008,P009,P010,P042,P043,	34



Final Permit-to-Install
PPG Industries - Delaware
Permit Number: P0112131
Facility ID: 0121010005
Effective Date: 1/14/2013

Authorization

Facility ID: 0121010005
Facility Description: Paints and allied products
Application Number(s): M0001998, M0001999, M0002000, M0002002, M0002004, M0002005
Permit Number: P0112131
Permit Description: Administrative Modification to update BAT and MACT language in applicable PTIs.
Permit Type: Administrative Modification
Permit Fee: \$900.00
Issue Date: 1/14/2013
Effective Date: 1/14/2013

This document constitutes issuance to:

PPG Industries - Delaware
760 Pittsburgh Drive
Delaware, OH 43015

of a Permit-to-Install 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:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

A handwritten signature in black ink, appearing to read "Scott J. Nally".

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0112131
 Permit Description: Administrative Modification to update BAT and MACT language in applicable PTIs.

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

Emissions Unit ID: P508
 Company Equipment ID: Volumetric Machine Fill #3
 Superseded Permit Number: P0109101
 General Permit Category and Type: Not Applicable

Group Name: High Speed Dispersers #2

Emissions Unit ID:	P109
Company Equipment ID:	High Speed Disperser
Superseded Permit Number:	01-07324
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P110
Company Equipment ID:	High Speed Disperser
Superseded Permit Number:	01-07324
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P459
Company Equipment ID:	High Speed Disperser
Superseded Permit Number:	01-08099
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P460
Company Equipment ID:	High Speed Disperser
Superseded Permit Number:	01-08099
General Permit Category and Type:	Not Applicable

Group Name: Lab Spray Booths

Emissions Unit ID:	K006
Company Equipment ID:	Spraybooth #9
Superseded Permit Number:	P0106643
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K007
Company Equipment ID:	Spraybooth #10
Superseded Permit Number:	P0106643
General Permit Category and Type:	Not Applicable

Group Name: Resin Reactors

Emissions Unit ID:	P008
Company Equipment ID:	Resin Reactor #1
Superseded Permit Number:	01-289
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	Resin Reactor #2
Superseded Permit Number:	01-289
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
PPG Industries - Delaware
Permit Number: P0112131
Facility ID: 0121010005
Effective Date: 1/14/2013

Emissions Unit ID:	P010
Company Equipment ID:	Resin Plant Solvent Recovery System
Superseded Permit Number:	01-289
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P042
Company Equipment ID:	Resin Reactor #3
Superseded Permit Number:	01-862
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P043
Company Equipment ID:	Resin Plant Cationic Stripper
Superseded Permit Number:	01-862
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
PPG Industries - Delaware
Permit Number: P0112131
Facility ID: 0121010005
Effective Date: 1/14/2013

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have



been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Central District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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



15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



Final Permit-to-Install
PPG Industries - Delaware
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B. Facility-Wide Terms and Conditions



Final Permit-to-Install
PPG Industries - Delaware
Permit Number: P0112131
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Effective Date: 1/14/2013

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



Final Permit-to-Install
PPG Industries - Delaware
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Facility ID: 0121010005
Effective Date: 1/14/2013

C. Emissions Unit Terms and Conditions



1. P508, Volumetric Machine Fill #3

Operations, Property and/or Equipment Description:

M3 Filling Line. Equipment covered includes M3 labeler, M3 filler, M3 lid press and casepacker.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile Organic Compound (VOC) emissions shall not exceed: 0.78 pound per hour (lb/hr); and 3.42 tons per year (tpy). See b)(2)a. and b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c.
c.	ORC 3704.03(F)	See d)(2)

(2) Additional Terms and Conditions

a. The hourly and annual VOC emission limitations are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, recordkeeping and/or reporting requirements to ensure compliance with these limits.

b. 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.

- 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 hourly and annual VOC emission limitations are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, recordkeeping and/or reporting requirements to ensure compliance with these limits.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The potential to emit VOC from this emissions unit was established based on the following calculation:

$$E_{VOC} = 12.46 \times \frac{S \times P \times M \times Q}{T}$$

where,

E_{voc} = total VOC loading emissions (lb/yr)

S = saturation factor (dimensionless; see Table 5.2-1 in AP-42)

P = vapor pressure of the material loaded at temperature T (psia)

M = vapor molecular weight (lb/lb-mol)

Q = volume of material loaded (1000 gal/yr)

T = temperature of liquid loaded (°R)

- (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 permit-to-install (PTI) 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 newPTI.



e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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(s)

VOC emissions shall not exceed 0.78 lb/hr and 3.42 tpy.

Applicable Compliance Method(s)

Compliance with the hourly emission limitation shall be determined by Section d)(1).

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hours per year and dividing by 2000 pounds.

g) Miscellaneous Requirements

- (1) None.



2. Emissions Unit Group -High Speed Dispersers #2: P109,P110,P459,P460,

EU ID	Operations, Property and/or Equipment Description
P109	High Speed Disperser 3C602
P110	High Speed Disperser 3C603
P459	High Speed Disperser 3C203
P460	High Speed Disperser 3C601

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p><u>For emissions units P109, P110, P459, and P460:</u></p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart HHHHH.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).</p> <p><u>For emissions units P109:</u></p> <p>Organic compound (OC) emissions shall not exceed 0.0209 pound per hour (lb/hr); 0.5016 pounds per day (lbs/day); and 2.20 tons per year (tpy).</p> <p>Particulate emissions (PE) from the baghouse shall not exceed 0.0002 lb/hr and 0.001 tpy.</p> <p><u>For emissions unit P110:</u></p> <p>OC emissions shall not exceed 0.0209</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>lb/hr; 0.5016 lbs/day; and 2.20 tpy</p> <p>PE from the baghouse shall not exceed 0.0002 lb/hr and 0.001 tpy.</p> <p><u>For emissions unit P459:</u></p> <p>OC emissions shall not exceed 0.0209 lb/hr; 0.5016 lbs/day; and 2.20 tpy</p> <p>PE from the baghouse shall not exceed 0.001 lb/hr and 0.005 tpy.</p> <p><u>For emissions unit P460:</u></p> <p>OC emissions shall not exceed 0.0209 lb/hr; 0.5016 lbs/day; and 2.20 tpy</p> <p>PE from the baghouse shall not exceed 0.003 lb/hr and 0.014 tpy.</p>
b.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)	<p><u>For emissions units P109, P110, P459, and P460:</u></p> <p>See b)(2)a.</p>
d.	OAC rule 3745-17-08(B)	<p><u>For emissions units P109, P110, P459, and P460:</u></p> <p>See b)(2)b.</p>
e.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
a.	<p>40 CFR Part 63, Subpart HHHHH</p> <p>[In accordance with 40 CFR 63.7985 this facility is an existing miscellaneous coating manufacturing facility subject to the emission limitations/control</p>	See b)(2)c., c)(3), d)(3), and e)(2)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	measures specified in this section.]	
b.	40 CFR 63.1-16	Table 10 to 40 CFR Part 63, Subpart HHHHH – Applicability of General Provisions to Subpart HHHHH shows which parts of the General Provisions in 40 CFR 63.1-16 apply.

(2) Additional Terms and Conditions

- a. Pursuant to paragraph (B)(11)(e) of OAC rule 3745-17-07, the requirements of OAC rule 3745-17-07(B) do not apply to these emissions units.
- b. Since this emissions unit is not located in an Appendix A area, pursuant to paragraph (A)(1) of OAC rule 3745-17-08, the requirements of OAC rule 3745-17-08(B) do not apply to these emissions units.
- c. The permittee is subject to the following MACT rule: Miscellaneous Coating Manufacturing, 40 CFR Part 63, Subpart HHHHH. The MACT Subpart HHHHH became effective on December 11, 2003. The requirements of this rule have been established in the Title V permit for this facility.

c) Operational Restrictions

- (1) The emission unit shall be covered with a vessel lid at all times except when operator access is necessary to add ingredients or take samples.
[Authority for term: OAC rule 3745-77-07(A)(1)]
- (2) The permittee shall operate the baghouse throughout any addition of pigments to the batch.
[Authority for term: OAC rule 3745-77-07(A)(1)]
- (3) The permittee shall comply with the applicable operational restrictions and requirements under 40 CFR Part 63, Subpart HHHHH, including the following sections:

63.8000	General requirements
63.8005	Requirements for process vessels
63.8010	Requirements for storage tanks
63.8015	Requirements for equipment leaks



63.8020	Requirements for wastewater streams
63.8025	Requirements for transfer operations
63.8030	Requirements for heat exchange systems
63.8050	Alternative means of compliance for emissions averaging for stationary process vessels
63.8055	Alternative means of compliance for weight percent HAP limit
63.8090	Compliance options if part of the plant is subject to both this subpart and another subpart
63.8095	Applicability of General Provisions to Subpart HHHHH

[Authority for term: 40 CFR Part 63, Subpart HHHHH and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records that document any time period when the baghouse was not in service during the addition of solids.

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

- (2) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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 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 weekly 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.

[Authority for term: OAC rule 3745-17-07(A)(1) and OAC rule 3745-77-07(C)]

- (3) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements under 40 CFR Part 63, Subpart HHHHH, including the following sections:

63.8080	Recordkeeping requirements
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[Authority for term 40 CFR Part 63, Subpart HHHHH and OAC rule 3745-77-07(C)]

e) Reporting Requirements

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

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

- (2) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 63, Subpart HHHHH, including the following sections:

63.8070	Notification requirement(s)
63.8075	Reporting requirements

[Authority for term: 40 CFR Part 63, Subpart HHHHH and OAC rule 3745-77-07(A)(3)(c)]

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 shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.



Applicable Compliance Method(s)

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

[Authority for term: OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]

(b) Emission Limitation

For emissions units P109 and P110, PE from the baghouse shall not exceed 0.0002 lb/hr and 0.001 tpy

Applicable Compliance Method(s)

Compliance with the hourly emission limitation may be demonstrated by multiplying the emission factor of 20 lbs PE/ton pigment produced (AP-42, 6.4-1, 5/83) by the maximum amount of paint that can be produced (0.0345 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.9997).

If required, the permittee shall demonstrate compliance by emission testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

Compliance with the annual emission limitation shall be demonstrated by multiplying the allowable emission rate of 0.0002 lbs PE/hr by the actual hours of operation per year, and dividing by 2000 lbs/ton.

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

(c) Emission Limitation

For emissions unit P459, PE from the baghouse shall not exceed 0.001 lb/hr and 0.005 tpy

Applicable Compliance Method(s)

Compliance with the hourly emission limitation may be demonstrated by multiplying the emission factor of 20 lbs PE/ton pigment produced (AP-42, 6.4-1, 5/83) by the maximum amount of paint that can be produced (0.0345 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.9997).

If required, the permittee shall demonstrate compliance by emission testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

Compliance with the annual emission limitation shall be demonstrated by multiplying the allowable emission rate of 0.001 lbs PE/hr by the actual hours of operation per year, and dividing by 2000 lbs/ton.

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



(d) Emission Limitation

For emissions unit P460, PE from the baghouse shall not exceed 0.003 lb/hr and 0.014 tpy

Applicable Compliance Method(s)

Compliance with the hourly emission limitation may be demonstrated by multiplying the emission factor of 20 lbs PE/ton pigment produced (AP-42, 6.4-1, 5/83) by the maximum amount of paint that can be produced (0.0345 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.9997).

If required, the permittee shall demonstrate compliance by emission testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

Compliance with the annual emission limitation shall be demonstrated by multiplying the allowable emission rate of 0.003 lbs PE/hr by the actual hours of operation per year, and dividing by 2000 lbs/ton.

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

(e) Emission Limitation

For emissions units P109, P110, P459, and P460 OC emissions from each emissions unit shall not exceed 0.0209 lb/hr; 0.5016 lbs/day; and 2.20 tpy

Compliance Method(s)

Compliance with the hourly rate shall be based on the emission rate from the most recent stack test for this emissions unit or a similar emissions unit.

Compliance with the daily OC emission limitation shall be determined by multiplying the hourly emission rate from the most recent emission test for this emissions unit or a similar emissions unit (lb OC/hr by 24 hrs/day).

Compliance with the annual OC emission limitation shall be determined by multiplying the hourly emission rate from the most recent emission test for this emissions unit or a similar emissions unit (lb OC/hr by 8760 hrs/yr and dividing by 2000 lbs/ton).

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

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

(a) The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit renewal as specified in the Title V.

(b) The emission testing shall be conducted to demonstrate compliance with the capture efficiency and control efficiency limitations for OC.



- (c) The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- (d) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.
- (e) The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- (f) Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- (g) Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- (h) A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: 40 CFR Part 63, Subpart HHHHH and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



3. Emissions Unit Group -Lab Spray Booths: K006,K007,

EU ID	Operations, Property and/or Equipment Description
K006	Spray booth
K007	Spray booth

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) b)(1)f., d)(3) – (5), and e)(2)a.
- 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 11/30/2001	<u>For emissions unit K006:</u> Particulate emissions (PE) shall not exceed 0.03 lb/hr and 0.13 tpy. <u>For emissions unit K007:</u> PE shall not exceed 0.02 lb/hr and 0.09 tpy. See b)(2)a. – b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006	See b)(2)c.
c.	ORC 3704.03(T) (Established by PTI P0106643, effective 12/13/2010)	<u>For emissions unit K006:</u> Volatile organic compound (VOC) emissions from coating and cleanup shall not exceed 13.14 tons per rolling, 12-month period. <u>For emissions unit K007:</u> Volatile organic compound (VOC) emissions from coating and cleanup shall not exceed 14.02 tons per rolling, 12-month period.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-07(A)(1)	Visible emissions from any stack shall not exceed twenty percent opacity as a six minute average, except as provided by the rule.
e.	OAC rule 3745-17-11(A)(1)(k)	See b)(2)d.
f.	ORC 3704.03(F)	See d)(3)-(5) and e(2)a.

(2) Additional Terms and Conditions

a. The hourly and yearly PE emission limitation is established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop monitoring, recordkeeping and/or reporting requirements to ensure compliance with these limits.

b. 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.

[Authority for term: OAC rule 3745-31-05(A)(3), as effective 11/30/01]

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 particulate emissions (PE) from this air contaminant source since the uncontrolled potential to emit for PE is less than 10 tons per year.

[Authority for term: OAC rule 3745-31-05(A)(3)(iii), as effective 12/01/06]

d. The requirements of OAC rule 3745-17-11 do not apply to these emissions units because they employ hand-held cup spray guns.

c) Operational Restrictions

(1) None.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following for each emissions unit:
 - a. the company identification number for each coating and cleanup material employed;
 - b. the total number of gallons of coating and cleanup material employed;
 - c. the VOC content of each coating and cleanup material employed, in pounds per gallon;
 - d. the VOC emissions from the coating and cleanup materials employed;
 - e. the updated rolling, 12-month summation of the total VOC emissions in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

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

- (2) 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 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 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 emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission 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.

[Authority for term: OAC rule 3745-17-07(A)(1) and OAC rule 3745-77-07(A)(3)]



- (3) The permit-to-install (PTI) application for this/these emissions unit(s), K006 and K007, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):
$$\text{TLV}/10 \times 8/X \times 5/Y = 4 \text{ TLV}/XY = \text{MAGLC}$$
 - d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):



Toxic Contaminant: Ethyl Benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 0.46

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 432.6

MAGLC (ug/m3): 10,338

Toxic Contaminant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr):

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,374

MAGLC (ug/m3): 10,338

Toxic Contaminant: Toluene

TLV (mg/m3): 188.4

Maximum Hourly Emission Rate (lbs/hr): 1.95

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,874

MAGLC (ug/m3): 4,485

The permittee, has demonstrated that emissions of ethyl benzene, toluene, and xylene, from emissions unit(s) K006 and K007, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

- (4) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:



- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

- (5) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.



[Authority for term: ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
- b. any corrective actions taken to minimize or eliminate the visible particulate emissions; and
- c. all exceedances of the rolling, 12-month summation emission limitation for VOC.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

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

(2) The Permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

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

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70]

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 Limitations

For K006 PE shall not exceed 0.03 lb/hr and 0.13 tpy

For K007 PE shall not exceed 0.02 lb/hr and 0.09 tpy



Applicable Compliance Method(s)

Compliance with the emission limitations may be established by the following equation:

$$E = (M) * (1-CE)$$

where:

E = PE emissions (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

CE = control efficiency (98%)

Annual compliance will be determined by multiplying the hourly emission rate by 8760 hours per year and dividing by 2000 pounds.

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

b. Emission Limitations

For K006 VOC emissions shall not exceed 13.14 tons per rolling, 12-month summation

For K007 VOC emissions shall not exceed 14.02 tons per rolling, 12-month summation

Applicable Compliance Method(s)

Compliance shall be determined by the monitoring and recordkeeping established in Section d)(1).

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

c. Emission Limitation:

Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

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

g) Miscellaneous Requirements

- (1) None.



4. Emissions Unit Group -Resin Reactors: P008,P009,P010,P042,P043,

EU ID	Operations, Property and/or Equipment Description
P008	Resin reactor system used for acrylic resin manufacturing in support of industrial and automotive paint production.
P009	Resin reactor system used for acrylic resin manufacturing in support of industrial and automotive paint production.
P010	Solvent recovery system for processing spent solvent generated by cleaning activities.
P042	Resin reactor system serving Uniprime (cationic) manufacture.
P043	Batch stripper for removing organic vapors from a resin batch.

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (For P008 – P010 PTI 01-289; For P042 – P043 PTI 01-862)	<u>For emissions units P008, P009, P010, P042 and P043:</u> The requirements of this rule include compliance with the requirements of 40 CFR Part 63, Subpart FFFF. <u>For emissions units P042 and P043:</u> Volatile organic compound (VOC) emissions shall not exceed 2.85 tons per year (tpy) from emissions units P042 and P043 combined. <u>For emissions unit P042:</u> PE shall not exceed 2.1 tpy <u>For emissions unit P009 and P042:</u> The requirements established pursuant to this rule are equivalent to the



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		requirements of OAC rule 3745-17-11(B) and OAC rule 3745-17-07(A). <u>For emissions unit P009:</u> See b)(2)a., d)(1)
b.	OAC rule 3745-17-07(A)	<u>For emissions unit P009:</u> Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except
c.	OAC rule 3745-17-11(B)	<u>For emissions unit P009 and P042:</u> Particulate emissions (PE) shall not exceed 2.13 pounds per hour (lbs/hr), based on Table I, which is more stringent than the allowable PE rate from Figure II.
d.	OAC rule 3745-21-07(M)(2)	The requirements specified by this rule are less stringent than the requirements established pursuant to 40 CFR Part 63, Subpart FFFF.
h.	40 CFR Part 63, Subpart FFFF [In accordance with 40 CFR 63.2435 this facility is an existing miscellaneous organic chemical manufacturing facility subject to the emission limitations/control measures specified in this section.]	See b)(2)b.
i.	40 CFR 63.1-16	Table 10 to 40 CFR Part 63, Subpart FFFF – Applicability of General Provisions to Subpart FFFF shows which parts of the General Provisions in 40 CFR 63.1-16 apply.

(2) Additional Terms and Conditions

- a. For emissions unit P009, the pressure drop across the baghouse shall be maintained within the range of 1 to 3 inches of water during solids charging.



b. The permittee is subject to the following MACT rule: Miscellaneous Organic Chemical Manufacturing, 40 CFR Part 63, Subpart FFFF. The MACT Subpart FFFF became effective on November 10, 2003. The requirements of this rule have been established in the Title V permit for this facility.

c) Operational Restrictions

(1) The permittee shall comply with the applicable operational restrictions and requirements under 40 CFR Part 63, Subpart FFFF.

63.2450	General requirements
63.2460	Requirements for batch process vents
63.2465	Requirements for process vents that emit hydrogen halide and halogen HAP or HAP metals
63.2470	Requirements for storage tanks
63.2475	Requirements for transfer racks
63.2480	Requirements for equipment leaks
63.2485	Requirements for wastewater streams and liquid streams in open systems with a MCPU
63.2490	Requirements for heat exchange systems
63.2495	Compliance with pollution prevention standard
63.2500	Compliance with emissions averaging
63.2505	Compliance with the alternative standard
63.2535	Compliance options if part of the plant is subject to both this subpart and another subpart
63.2540	General provisions to subpart FFFF

[Authority for term: 40 CFR Part 63, Subpart FFFF and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) For P009, the permittee shall maintain daily records that document any time periods when the baghouse was not in service when the emissions unit was in operation.

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



- (2) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements under 40 CFR Part 63, Subpart FFFF.

63.2515	Notification requirement(s)
63.2525	Recordkeeping requirement(s)

[Authority for term: 40 CFR Part 63, Subpart FFFF and OAC rule 3745-77-07(C)]

e) Reporting Requirements

- (1) The permittee shall also submit annual reports that specify the total organic compound emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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

- (2) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 63, Subpart FFFF.

63.2520	Reporting requirement(s)
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[Authority for term: 40 CFR Part 63, Subpart FFFF and OAC rule 3745-77-07(A)(3)(c)]

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 shall not exceed 20 percent opacity as a six-minute average, except as specified by rule for emissions unit P009.

Applicable Compliance Method(s)

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

[Authority for term: OAC rule 3745-17-03(B)(1)(a) and OAC rule 3745-77-07(C)(1)]



b. Emission Limitation

PE shall not exceed 2.13 lbs/hr, based on Table I which is more stringent than the allowable PE rate from Figure II, for emissions units P009 and P042.

Applicable Compliance Method(s)

Compliance with the hourly emission limitation may be demonstrated by multiplying the emission factor of 5.5 lbs of particulates/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of paint that can be produced (0.375 ton/hr), and by the assumed control efficiency (CE) of the baghouse (1-0.98).

The permittee shall demonstrate compliance by emission testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

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

c. Emission Limitation

For emission unit P042, PE shall not exceed 2.1 tpy

Applicable Compliance Method(s)

Compliance may be demonstrated by summing the emissions from each solids charging location. To determine emissions from each location, multiply the emission factor of 5.5 lbs PE/ton of paint produced (AIRS, 3/90, 30101401) by the maximum amount of solids charged (0.375 ton/hr) by the control efficiency (CE) of the fabric filter (1-0.98) by 8760 hrs/yr and divide by 2000 lbs/ton.

d. Emission Limitation

VOC emissions shall not exceed 2.85 tpy from emissions units P042 and P043 combined.

Applicable Compliance Method(s)

Compliance shall be demonstrated by multiplying the uncontrolled emission rate (lbs VOC/day) from P042 and P043 combined, by 365 days/yr, multiplying by the control efficiency of the TOU established during the most recent emission test that demonstrated that the emissions unit was in compliance, and dividing by 2000 lbs/ton.

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

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 3 months after issuance of the permit and within 6 months prior to permit expiration as specified in the Title V.



- b. The emission testing shall be conducted to demonstrate compliance with the requirements established by 40 CFR Part 63, Subpart FFFF.
- c. The applicable test method(s) found in Table 12 to Subpart FFFF of Part 63 – Applicability of General Provisions to Subpart FFFF shall be employed to demonstrate compliance.
- d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- e. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- f. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

[Authority for term: 40 CFR Part 63, Subpart FFFF and OAC rule 3745-77-07(C)(1)]

g) **Miscellaneous Requirements**

- (1) None.