



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**RE: FINAL PERMIT TO INSTALL  
RICHLAND COUNTY  
Application No: 03-13402**

**CERTIFIED MAIL**

**DATE:** 2/27/2001

PPG Industries Inc - Crestline  
Susan Corbin  
5066 State Route 30  
Crestline, OH 44827

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

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA      NWDO      Richland Cty Reg Plan Com



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install  
Terms and Conditions**

**Issue Date: February 27, 2001  
Effective Date: February 27, 2001**

**FINAL PERMIT TO INSTALL 03-13402**

Application Number: 03-13402  
APS Premise Number: 0370000217  
Permit Fee: **\$2600**  
Name of Facility: PPG Industries Inc - Crestline  
Person to Contact: Susan Corbin  
Address: 5066 State Route 30  
Crestline, OH 44827

Location of proposed air contaminant source(s) [emissions unit(s)]:

**5066 State Route 30  
Crestline, Ohio**

Description of proposed emissions unit(s):

**Modification to existing silk screening operations and a miscellaneous metal parts coating operation.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. Permit to Install General Terms and Conditions

#### 1. Compliance Requirements

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

#### 2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

#### 3. Records Retention Requirements

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

#### 4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

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

facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the

proposed sources are inadequate or cannot meet applicable standards.

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

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

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

- a. If 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).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is

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Facility ID: 0370000217

granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

**14. Construction Compliance Certification**

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

**15. Fees**

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

**B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	93.86
OC*	141.3
Individual HAP	9.9
Aggregate HAPs	24.9

\*OC are inclusive  
of VOC

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

### A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K004 - Miscellaneous metal parts coating operation (Mold shop lay out, formerly permitted as R002) modification (modified to establish synthetic minor requirements)	OAC rule 3745-31-05(A)(3)	Use of no more than 10 gallons of coatings and cleanup materials per day
		30 lbs OC/day and 5.5 TPY OC from coatings and cleanup materials
		See A.2.a
	OAC rule 3745-21-09(U)(2)(e)(iii)	
	OAC rule 3745-35-07(B): Synthetic minor requirements for the purpose of limiting emissions to levels below Title V applicability thresholds	Group Limit for K004 and P017-P028: 93.86 tons VOC per rolling 12-month period based on coating usage and VOC content restrictions (see A.2.b.)
		Group Limit for K004 and P017-P028: 9.9 tons per rolling 12-month period of any individual HAP* and 24.9 tons per rolling 12-month period of any combination of HAPs (see A.2.b.)

\* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

### 2. Additional Terms and Conditions

- 2.a The emissions limitation established by this rule is less stringent than those established by

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Emissions Unit ID: **K004**

OAC rule 3745-31-05(A)(3) (BAT).

- 2.b** The permittee has requested federally enforceable limitations for emissions units K004 and P017-P028, of 93.86 tons of VOC, 9.9 tons of any individual HAP, and 24.9 tons of combined HAPs per rolling, 12-month period, all based on content and gallon usage restrictions for the purpose of avoiding Title V applicability (see B.1, B.2 and B.3).

**B. Operational Restrictions**

1. The permittee shall not employ any coating, as applied, in excess of 7.0 lbs VOC/gallon (process coatings) and 11.0 lbs VOC/gallon (machinist ink and/or special order process coatings).
2. The maximum annual coating usage for emissions units K004, P017-P028 combined shall not exceed any of the following:
  - a. 3,050 gallons of coating with a maximum VOC content of 11.0 lbs/gallon of coating;
  - b. 25,067 gallons of coating with a maximum VOC content of 7.0 lbs/gallon of coating;
  - c. 25,067 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified in the table below:

**Maximum Allowable Cumulative Coating Usage (gallons)**

<b><u>Month(s)</u></b>	<b><u>&lt;11.0 lbs VOC/gal</u></b>	<b><u>&lt;7.0 lbs VOC/gal</u></b>	<b><u>Combined</u></b>
1-1	254	2,089	2,089
1-2	508	4,178	4,178
1-3	762	6,267	6,267
1-4	1,016	8,356	8,356
1-5	1,270	10,445	10,445
1-6	1,524	12,534	12,534
1-7	1,778	14,623	14,623
1-8	2,032	16,712	16,712
1-9	2,286	18,801	18,801
1-10	2,540	20,890	20,890

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Emissions Unit ID: **K004**

1-11	2,794	22,979	22,979
1-12	3,050	25,067	25,067

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

3. Combined annual HAP emissions from emissions units K004, P017-P028 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons)**

<b>Month(s)</b>	<b>Individual HAP</b>	<b>Combined HAPs</b>
1-1	0.825	2.075
1-2	1.650	4.150
1-3	2.475	6.225
1-4	3.300	8.300
1-5	4.125	10.375
1-6	4.950	12.450
1-7	5.775	14.525
1-8	6.600	16.600
1-9	7.425	18.675
1-10	8.250	20.750
1-11	9.075	22.825
1-12	9.900	24.900

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations of 9.9 tons and 24.9 tons shall be based upon a rolling, 12-month summation of the monthly emission rates.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for emissions unit K004:

- a. the company identification for each coating and cleanup material employed;
  - b. the volume, in gallons/day, of each coating and cleanup material employed;
  - c. the total volume, in gallons/day, of all of the coatings and cleanup materials employed;
  - d. the OC content of each coating and cleanup material, in lbs OC/gallon;
  - e. the OC emission rate for each coating and cleanup material, (b) x (d) in lbs OC/day;
  - f. the total OC emission rate for all coatings and cleanup materials, sum of (e) in lbs/day; and
  - g. the annual, year to date OC emission rate from all coatings and cleanup materials, sum of (f) for each calendar day to date from January to December x 1 ton/2000 lbs, in tons OC/year.
2. The permittee shall collect and record the following information each month for emissions units K004, P017-P028, as a group:
- a. the company identification for each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material, in lbs/gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emission rate for each coating and cleanup material, (b) x (c) x 1 ton/2000 lbs., in tons per month;
  - e. the total VOC emission rate for all coatings and cleanup materials, summation of (d) in tons per month;
  - f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of VOC, in tons per month; and,
  - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of VOC, based on a rolling, 12-month summation.
3. In addition to the above information, the permittee shall also record the following information for each month for emissions units K004, P017-P028, as a group:
- a. for the first 12 months of operation under the provisions of this permit:

- i. the cumulative gallon usage rate for each coating;
  - ii. the total number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
  - iii. the total number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating; and,
  - iv. the total number of gallons of all coatings.
- b. after the first 12 months of operation under the provisions of this permit:
- i. the annual\* number of gallons of each coating;
  - ii. the annual\* number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
  - iii. the annual\* number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating;
  - iv. the annual\* number of gallons of all coatings.

\*Based upon a rolling, 12-month summation of the coating usage rates.

Note: The coating information recorded above must be for the materials employed, including any thinning solvents added at the emissions unit.

4. The permittee shall collect and record the following information regarding HAPs emissions each month for emissions units K004, P017-P028, as a group:
- a. the company identification of each coating and cleanup material employed;
  - b. the lbs per gallon of each HAP in each coating and cleanup material, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each HAP from each coating and cleanup material employed, (b) x (c) for each HAP in lbs/month;

- e. the total emission rate for each HAP from all coatings and cleanup materials employed, summation of (d) for each HAP in lbs/month;
- f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, summation of (e) for all HAPs in lbs/month;
- g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
- h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

#### **D. Reporting Requirements**

- 1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that coating line K004 employs more than 10 gallons of coatings and cleanup materials per day and/or more than 30 lbs of OC/day. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
- 2. The permittee shall submit annual written reports for emissions unit K004, of any deviations (excursions) from the annual emission limitation in section A.1. (5.5 tons OC/year from coatings and cleanup materials). The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).
- 3. The permittee shall submit deviation (excursion) reports for emissions units K004, P017 - P028, as a group, which identify exceedances of any of the following:
  - a. Any exceedances of the maximum allowable gallon usage rates and VOC content limitations specified in paragraphs B.1. and B.2.; and
  - b. Any exceedances of the maximum emissions limitations for each HAP and total combined HAPs specified in paragraph B.3.

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Issued: February 27, 2001

Emissions Unit ID: **K004**

4. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit, unless otherwise specified.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 30 lbs OC/day and 5.5 TPY OC from coatings and cleanup materials  
  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - b. Emission Limitation: Group limit of 93.86 tons VOC per rolling 12-month period based on coating usage and VOC content restrictions  
  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.2.
  - c. Emission Limitation: Group limit of 9.9 tons per rolling 12-month period of any individual HAP and 24.9 tons per rolling 12-month period of any combination of HAPs  
  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.4.

#### **F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The terms and conditions of this PTI shall supersede the terms and conditions for this emissions unit established by PTI application number 03-13844 issued on February 8, 1989.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P017 - Silk screen printing (North room 2, formerly permitted as K001) modification (modified to establish synthetic minor requirements)	OAC rule 3745-31-05(A)(3)	4.67 lbs OC/hr. on days when employing exclusively non-photochemically reactive coatings and cleanup materials. (See A.2.a.i.)
	OAC rule 3745-21-07(G)(2)	5.3 tons OC/yr from all coatings and cleanup materials.
	OAC rule 3745-35-07(B): Synthetic minor requirements for the purpose of limiting emissions to levels below Title V applicability thresholds	8 lbs OC/hr, 40 lbs OC/day (See A.2.a.)
		Group Limit for K004 and P017-P028: 93.86 tons VOC per rolling 12-month period based on coating usage and VOC content restrictions (see A.2.b)
		Group Limit for K004 and P017-P028: 9.9 tons per rolling 12-month period of any individual HAP* and 24.9 tons per rolling 12-month period of any combination of HAPs (see A.2.b)

\* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

**2. Additional Terms and Conditions**

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**Issued: February 27, 2001**

Emissions Unit ID: **P017**

- 2.a** Emissions unit P017 will be subject to the following emissions limitations based on the type of coating and cleanup materials employed on a given day:

- i. On days when exclusively non-photochemically reactive coatings and non-photochemically reactive cleanup materials are employed, OC emissions from the coating and cleanup operations are subject to an emissions limitation of 4.67 lbs OC/hr.
  - ii. On days when any portion of the coatings employed are photochemically reactive and the cleanup material is non-photochemically reactive, OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) are subject to an emissions limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 883 lbs/month.
  - iii. On days when all or a portion of the cleanup materials employed are photochemically reactive, all OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) and OC emissions from photochemically reactive cleanup materials employed are subject to an emission limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 883 lbs/month.
  - iv. Annual OC emissions cannot exceed 7.3 tons if photochemically reactive coatings and/or photochemically reactive cleanup materials are employed each and every day.
- 2.b** The permittee has requested federally enforceable limitations for emissions units K004 and P017-P028, of 93.86 tons VOC, 9.9 tons of any individual HAP, and 24.9 tons of combined HAPs per rolling, 12-month period, all based on content and gallon usage restrictions for the purpose of avoiding Title V applicability (see B.1, B.2 and B.3).

## **B. Operational Restrictions**

1. The permittee shall not employ any coating, as applied, in excess of 7.0 lbs VOC/gallon (process coatings) and 11.0 lbs VOC/gallon (machinist ink and/or special order process coatings).
2. The maximum annual coating usage for emissions units K004, P017-P028 combined shall not exceed any of the following:

- a. 3,050 gallons of coating with a maximum VOC content of 11.0 lbs/gallon of coating;
- b. 25,067 gallons of coating with a maximum VOC content of 7.0 lbs/gallon of coating;
- c. 25,067 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified in the table below:

**Maximum Allowable Cumulative Coating Usage (gallons)**

<b><u>Month(s)</u></b>	<b><u>&lt;11.0 lbs VOC/gal</u></b>	<b><u>&lt;7.0 lbs VOC/gal</u></b>	<b><u>Combined</u></b>
1-1	254	2,089	2,089
1-2	508	4,178	4,178
1-3	762	6,267	6,267
1-4	1,016	8,356	8,356
1-5	1,270	10,445	10,445
1-6	1,524	12,534	12,534
1-7	1,778	14,623	14,623
1-8	2,032	16,712	16,712
1-9	2,286	18,801	18,801
1-10	2,540	20,890	20,890
1-11	2,794	22,979	22,979
1-12	3,050	25,067	25,067

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

3. Combined annual HAP emissions from emissions units K004, P017-P028 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

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Emissions Unit ID: P017

**Maximum Allowable Cumulative HAP Emission Rates (tons)**

<b>Month(s)</b>	<b>Individual HAP</b>	<b>Combined HAPs</b>
1-1	0.825	2.075
1-2	1.650	4.150
1-3	2.475	6.225
1-4	3.300	8.300
1-5	4.125	10.375
1-6	4.950	12.450
1-7	5.775	14.525
1-8	6.600	16.600
1-9	7.425	18.675
1-10	8.250	20.750
1-11	9.075	22.825
1-12	9.900	24.900

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations of 9.9 tons and 24.9 tons shall be based upon a rolling, 12-month summation of the monthly emission rates.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for emissions unit P017:
  - a. The company identification for each coating and cleanup material employed with an identification of whether each material is a photochemically reactive material.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The organic compound (OC) content of each coating and cleanup material, in pounds per gallon.

- d. The total OC emission rate for all coatings and cleanup materials, i.e. (b) x (c) in pounds of OC per day calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii. above.
  - e. The total number of hours the emissions unit was in operation.
  - f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average) calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii. above.
2. The permittee shall collect and record the following information each month for emissions unit P017:
- a. The company identification for each coating and cleanup material employed.
  - b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material.
  - c. The number of gallons of each coating and cleanup material employed.
  - d. The OC content of each coating and cleanup material, in lbs/gallon.
  - e. The OC emission rate for each coating and cleanup material, (c) x (d) in lbs/month.
  - f. The total OC emission rate for all coating and cleanup materials, sum of (e) in lbs/month.
  - g. The annual, year to date OC emission rate from all coating and cleanup material usage, sum of (f) for each calendar month to date from January to December.

[Note: The coating information supplied in C.1. and C.2 above must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for emissions units K004, P017-P028, as a group:
- a. the company identification for each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material, in pounds per gallon;

- c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emission rate for each coating and cleanup material, i.e. (b) x (c) x 1 ton/2000 lbs., in tons per month;
  - e. the total VOC emission rate for all coatings and cleanup material, i.e. summation of (d), in tons per month;
  - f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of VOC, in tons per month; and,
  - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of VOC, based on a rolling, 12-month summation.
4. In addition to the above information, the permittee shall also record the following information for each month for emissions units K004, P017-P028, as a group:
- a. for the first 12 months of operation under the provisions of this permit:
    - i. the cumulative gallon usage rate for each coating;
    - ii. the total number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the total number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating; and,
    - iv. the total number of gallons of all coatings.
  - b. after the first 12 months of operation under the provisions of this permit:
    - i. the annual\* number of gallons of each coating;
    - ii. the annual\* number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the annual\* number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating;
    - iv. the annual\* number of gallons of all coatings.

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\*Based upon a rolling, 12-month summation of the coating usage rates.

Note: The coating information recorded above must be for the materials employed, including any thinning solvents added at the emissions unit.

5. The permittee shall collect and record the following information regarding HAPs emissions each month for emissions units K004, P017-P028, as a group:
  - a. the company identification for each coating and cleanup material employed;
  - b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the emission rate for each HAP from each coating and cleanup material employed, (b) x (c), for each HAP in lbs/month;
  - e. the total emission rate for each HAP from all coatings and cleanup materials employed, i.e. the summation of (d) for each HAP, in lbs/month ;
  - f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, i.e. the summation of (e) for all HAPs in lbs/month;
  - g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
  - h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emissions unit P017, which include the following information:

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- a. An identification of each day during which the average hourly OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - b. An identification of each day during which the OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 40 pounds per day, and the actual OC emissions for each such day.
  - c. An identification of each day during which the average hourly OC emissions generated by the operating scenario outlined in A.2.a.i. exceeded 4.67 pounds per hour, and the actual average hourly OC emissions for each such day.
2. The permittee shall submit annual written reports for emissions unit P017, of any deviation (excursion) from the annual emissions limitation of 5.3 tons OC/year.

These reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

3. The permittee shall submit deviation (excursion) reports for emissions units K004, P017-P028, as a group, which identify exceedances of any of the following:
  - a. Any exceedances of the maximum allowable gallon usage rates and VOC content limitations specified in paragraphs B.1. and B.2.; and
  - b. Any exceedances of the maximum emissions limitations for each HAP and total combined HAPs specified in paragraph B.3.
4. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit, unless otherwise specified.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 4.67 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials.

Applicable Compliance Method: Compliance shall be based on the recordkeeping

requirements as specified in C.1.

- b. Emission Limitation: 5.3 tons OC/yr from all coatings and cleanup materials.

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.2.

- c. Emission Limitation: 8 lbs OC/hr, 40 lbs OC/day

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.

- d. Emission Limitation: Group limit of 93.86 tons VOC per rolling 12-month period based on coating usage and OC content restrictions

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.3.

- e. Emission Limitation: Group limit of 9.9 tons per rolling 12-month period of any individual HAP and 24.9 tons per rolling 12-month period of any combination of HAPs

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.5.

## F. Miscellaneous Requirements

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

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Issued: February 27, 2001

Emissions Unit ID: P018

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P018 - Silk screen printing (North room 3, formerly permitted as K001) modification (modified to establish synthetic minor requirements)	OAC rule 3745-31-05(A)(3)	4.67 lbs OC/hr. on days when employing exclusively non-photochemically reactive coatings and cleanup materials. (See A.2.a.i.)
	OAC rule 3745-21-07(G)(2)	5.3 tons OC/yr from all coatings and cleanup materials.
	OAC rule 3745-35-07(B): Synthetic minor requirements for the purpose of limiting emissions to levels below Title V applicability thresholds	8 lbs OC/hr, 40 lbs OC/day (See A.2.a.)
		Group Limit for K004 and P017-P028: 93.86 tons VOC per rolling 12-month period based on coating usage and VOC content restrictions (see A.2.b.)
		Group Limit for K004 and P017-P028: 9.9 tons per rolling 12-month period of any individual HAP* and 24.9 tons per rolling 12-month period of any combination of HAPs (see A.2.b.)

\* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

**PPG Industries Inc - Crestline**  
**PTI**  
**Issue**

**Facility ID: 0370000217**

Emissions Unit ID: **P018**

**2. Additional Terms and Conditions**

**2.a** Emissions unit P018 will be subject to the following emissions limitations based on the type of coating and cleanup materials employed on a given day:

- i. On days when exclusively non-photochemically reactive coatings and non-photochemically reactive cleanup materials are employed, OC emissions from the coating and cleanup operations are subject to an emissions limitation of 4.67 lbs OC/hr.
  - ii. On days when any portion of the coatings employed are photochemically reactive and the cleanup material is non-photochemically reactive, OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) are subject to an emissions limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 883 lbs/month.
  - iii. On days when all or a portion of the cleanup materials employed are photochemically reactive, all OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) and OC emissions from photochemically reactive cleanup materials employed are subject to an emission limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 883 lbs/month.
  - iv. Annual OC emissions cannot exceed 7.3 tons if photochemically reactive coatings and/or photochemically reactive cleanup materials are employed each and every day.
- 2.b** The permittee has requested federally enforceable limitations for emissions units K004 and P017-P028, of 93.86 tons VOC, 9.9 tons of any individual HAP, and 24.9 tons of combined HAPs per rolling, 12-month period, all based on content and gallon usage restrictions for the purpose of avoiding Title V applicability (see B.1, B.2 and B.3).

## **B. Operational Restrictions**

1. The permittee shall not employ any coating, as applied, in excess of 7.0 lbs VOC/gallon (process coatings) and 11.0 lbs VOC/gallon (machinist ink and/or special order process coatings).
2. The maximum annual coating usage for emissions units K004, P017-P028 combined shall not exceed any of the following:

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- a. 3,050 gallons of coating with a maximum VOC content of 11.0 lbs/gallon of coating;
- b. 25,067 gallons of coating with a maximum VOC content of 7.0 lbs/gallon of coating;
- c. 25,067 gallons for all coatings combined.

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The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified in the table below:

**Maximum Allowable Cumulative Coating Usage (gallons)**

<b><u>Month(s)</u></b>	<b><u>&lt;11.0 lbs VOC/gal</u></b>	<b><u>&lt;7.0 lbs VOC/gal</u></b>	<b><u>Combined</u></b>
1-1	254	2,089	2,089
1-2	508	4,178	4,178
1-3	762	6,267	6,267
1-4	1,016	8,356	8,356
1-5	1,270	10,445	10,445
1-6	1,524	12,534	12,534
1-7	1,778	14,623	14,623
1-8	2,032	16,712	16,712
1-9	2,286	18,801	18,801
1-10	2,540	20,890	20,890
1-11	2,794	22,979	22,979
1-12	3,050	25,067	25,067

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

3. Combined annual HAP emissions from emissions units K004, P017-P028 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons)**

<b>Month(s)</b>	<b>Individual HAP</b>	<b>Combined HAPs</b>
1-1	0.825	2.075
1-2	1.650	4.150
1-3	2.475	6.225
1-4	3.300	8.300
1-5	4.125	10.375
1-6	4.950	12.450
1-7	5.775	14.525
1-8	6.600	16.600
1-9	7.425	18.675
1-10	8.250	20.750
1-11	9.075	22.825
1-12	9.900	24.900

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations of 9.9 tons and 24.9 tons shall be based upon a rolling, 12-month summation of the monthly emission rates.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for emissions unit P018:
  - a. The company identification for each coating and cleanup material employed with an identification of whether each material is a photochemically reactive material.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The OC content of each coating and cleanup material, in pounds per gallon.
  - d. The total OC emission rate for all coatings and cleanup materials, i.e. (b) x (c) in pounds of OC per day calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii. above.
  - e. The total number of hours the emissions unit was in operation.
  - f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average) calculated consistent with the limitations specified in

paragraphs A.2.a.i. - A.2.a.iii. above.

2. The permittee shall collect and record the following information each month for emissions unit P018:
  - a. The company identification for each coating and cleanup material employed.
  - b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material.
  - c. The number of gallons of each coating and cleanup material employed.
  - d. The OC content of each coating and cleanup material, in lbs/gallon.
  - e. The OC emission rate for each coating and cleanup material, (c) x (d) in lbs/month.
  - f. The total OC emission rate for all coating and cleanup materials, sum of (e) in lbs/month.
  - g. The annual, year to date OC emission rate from all coating and cleanup material usage, sum of (f) for each calendar month to date from January to December.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for emissions units K004, P017-P028, as a group:
  - a. the company identification for each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material, in pounds per gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emission rate for each coating and cleanup material, i.e. (b) x (c) x 1 ton/2000 lbs., in tons per month;
  - e. the total VOC emission rate for all coating and cleanup materials, i.e. summation of (d), in tons per month;

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- f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of VOC, in tons per month; and,
  - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of VOC, based on a rolling, 12-month summation.
4. In addition to the above information, the permittee shall also record the following information for each month for emissions units K004, P017-P028, as a group:
- a. for the first 12 months of operation under the provisions of this permit:
    - i. the cumulative gallon usage rate for each coating;
    - ii. the total number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the total number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating; and,
    - iv. the total number of gallons of all coatings.
  - b. after the first 12 months of operation under the provisions of this permit:
    - i. the annual\* number of gallons of each coating;
    - ii. the annual\* number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the annual\* number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating;
    - iv. the annual\* number of gallons of all coatings.

\*Based upon a rolling, 12-month summation of the coating emission rates.

Note: The coating information recorded above must be for the materials employed, including any thinning solvents added at the emissions unit.

5. The permittee shall collect and the following information regarding HAPs emissions each month



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- c. An identification of each day during which the average hourly OC emissions generated by the operating scenario outlined in A.2.a.i. exceeded 4.67 pounds per hour, and the actual average hourly OC emissions for each such day.
2. The permittee shall submit annual written reports for emissions unit P018, of any deviation (excursion) from the annual emissions limitation of 5.3 tons OC/year.  
  
These reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).
3. The permittee shall submit deviation (excursion) reports for emissions units K004, P017-P028, as a group, which identify exceedances of any of the following:
  - a. Any exceedances of the maximum allowable gallon usage rates and VOC content limitations specified in paragraphs B.1. and B.2.; and
  - b. Any exceedances of the maximum emissions limitations for each HAP and total combined HAPs specified in paragraph B.3.
4. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit, unless otherwise specified.

## **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 4.67 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials.  
  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - b. Emission Limitation: 5.3 tons OC/yr from all coatings and cleanup materials.  
  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.2.
  - c. Emission Limitation: 8 lbs OC/hr, 40 lbs OC/day

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.

- d. Emission Limitation: Group limit of 93.86 tons VOC per rolling 12-month period based on coating usage and OC content restrictions

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.3.

- e. Emission Limitation: Group limit of 9.9 tons per rolling 12-month period of any individual HAP and 24.9 tons per rolling 12-month period of any combination of HAPs

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.5.

## F. Miscellaneous Requirements

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

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Emissions Unit ID: P019

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P019 - Silk screen printing (1 DBO-A, formerly permitted as K002) modification (modified to establish synthetic minor requirements)	OAC rule 3745-31-05(A)(3)	7.36 lbs OC/hr. on days when employing exclusively non-photochemically reactive coatings and cleanup materials. (See A.2.a.i.)
	OAC rule 3745-21-07(G)(2)	14.30 tons OC/yr from all coatings and cleanup materials. (See A.2.a.iv.)
	OAC rule 3745-35-07(B): Synthetic minor requirements for the purpose of limiting emissions to levels below Title V applicability thresholds	8 lbs OC/hr, 40 lbs OC/day (See A.2.a.)
		Group Limit for K004 and P017-P028: 93.86 tons OC per rolling 12-month period based on coating usage and OC content restrictions (see A.2.b.)
		Group Limit for K004 and P017-P028: 9.9 tons per rolling 12-month period of any individual HAP* and 24.9 tons per rolling 12-month period of any combination of HAPs (see A.2.b.)

\* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

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**2. Additional Terms and Conditions**

- 2.a** Emissions unit P019 will be subject to the following emissions limitations based on the type of coating and cleanup materials employed on a given day:

- i. On days when exclusively non-photochemically reactive coatings and non-photochemically reactive cleanup materials are employed, OC emissions from the coating and cleanup operations are subject to an emissions limitation of 7.36 lbs OC/hr.
  - ii. On days when any portion of the coatings employed are photochemically reactive and the cleanup material is non-photochemically reactive, OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) are subject to an emissions limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 2,383 lbs/month.
  - iii. On days when all or a portion of the cleanup materials employed are photochemically reactive, all OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) and OC emissions from photochemically reactive cleanup materials employed are subject to an emission limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 2,383 lbs/month.
  - iv. Annual OC emissions cannot exceed 7.3 tons if photochemically reactive coatings and/or photochemically reactive cleanup materials are employed each and every day.
- 2.b** The permittee has requested federally enforceable limitations for emissions units K004 and P017-P028, of 93.86 tons VOC, 9.9 tons of any individual HAP, and 24.9 tons of combined HAPs per rolling, 12-month period, all based on content and gallon usage restrictions for the purpose of avoiding Title V applicability (see B.1, B.2 and B.3).

## **B. Operational Restrictions**

1. The permittee shall not employ any coating, as applied, in excess of 7.0 lbs VOC/gallon (process coatings) and 11.0 lbs VOC/gallon (machinist ink and/or special order process coatings).
2. The maximum annual coating usage for emissions units K004, P017-P028 combined shall not exceed any of the following:

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- a. 3,050 gallons of coating with a maximum VOC content of 11.0 lbs/gallon of coating;
- b. 25,067 gallons of coating with a maximum VOC content of 7.0 lbs/gallon of coating;
- c. 25,067 gallons for all coatings combined.

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The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified in the table below:

**Maximum Allowable Cumulative Coating Usage (gallons)**

<b><u>Month(s)</u></b>	<b><u>&lt;11.0 lbs VOC/gal</u></b>	<b><u>&lt;7.0 lbs VOC/gal</u></b>	<b><u>Combined</u></b>
1-1	254	2,089	2,089
1-2	508	4,178	4,178
1-3	762	6,267	6,267
1-4	1,016	8,356	8,356
1-5	1,270	10,445	10,445
1-6	1,524	12,534	12,534
1-7	1,778	14,623	14,623
1-8	2,032	16,712	16,712
1-9	2,286	18,801	18,801
1-10	2,540	20,890	20,890
1-11	2,794	22,979	22,979
1-12	3,050	25,067	25,067

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

3. Combined annual HAP emissions from emissions units K004, P017-P028 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons)**

<b>Month(s)</b>	<b>Individual HAP</b>	<b>Combined HAPs</b>
1-1	0.825	2.075
1-2	1.650	4.150
1-3	2.475	6.225
1-4	3.300	8.300
1-5	4.125	10.375
1-6	4.950	12.450
1-7	5.775	14.525
1-8	6.600	16.600
1-9	7.425	18.675
1-10	8.250	20.750
1-11	9.075	22.825
1-12	9.900	24.900

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations of 9.9 tons and 24.9 tons shall be based upon a rolling, 12-month summation of the monthly emission rates.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for emissions unit P019:
  - a. The company identification for each coating and cleanup material employed with an identification of whether each material is a photochemically reactive material.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The OC content of each coating and cleanup material, in pounds per gallon.
  - d. The total OC emission rate for all coatings and cleanup materials, i.e. (b) x (c) in pounds of OC per day calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii above.
  - e. The total number of hours the emissions unit was in operation.
  - f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in

pounds per hour (average) calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii above.

2. The permittee shall collect and record the following information each month for emissions unit P019:
  - a. The company identification for each coating and cleanup material employed.
  - b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material.
  - c. The number of gallons of each coating and cleanup material employed.
  - d. The OC content of each coating and cleanup material, in lbs/gallon.
  - e. The OC emission rate for each coating and cleanup material, (c) x (d) in lbs/month.
  - f. The total OC emission rate for all coating and cleanup materials, sum of (e) in lbs/month.
  - g. The annual, year to date OC emission rate from all coating and cleanup material usage, sum of (f) for each calendar month to date from January to December.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for emissions units K004, P017-P028, as a group:
  - a. the company identification for each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material, in pounds per gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emission rate for each coating and cleanup material, i.e. (b) x (c) x 1 ton/2000 lbs., in tons per month;
  - e. the total VOC emission rate for all coatings and cleanup materials, i.e. the summation of (d), in tons per month;

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- f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of VOC, in tons per month; and,
  - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of VOC, based on a rolling, 12-month summation.
4. In addition to the above information, the permittee shall also record the following information for each month for emissions units K004, P017-P028, as a group:
- a. for the first 12 months of operation under the provisions of this permit:
    - i. the cumulative gallon usage rate for each coating;
    - ii. the total number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the total number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating; and,
    - iv. the total number of gallons of all coatings.
  - b. after the first 12 months of operation under the provisions of this permit:
    - i. the annual\* number of gallons of each coating;
    - ii. the annual\* number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the annual\* number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating;
    - iv. the annual\* number of gallons of all coatings.

\*Based upon a rolling, 12-month summation of the coating emission rates.

Note: The coating information recorded above must be for the materials employed, including any thinning solvents added at the emissions unit.

5. The permittee shall collect and the following information regarding HAPs emissions each month

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for emissions units K004, P017-P028, as a group;

- a. the name and identification of each coating and cleanup material employed;
- b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
- c. the number of gallons of each coating and cleanup material employed;
- d. the emission rate for each HAP from each coating and cleanup material employed, i.e. (b) x (c), for each HAP in lbs/month;
- e. the total HAP emission rate for each HAP from all coatings and cleanup materials employed, i.e. the summation of (d) for each HAP, in lbs/month;
- f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, i.e. the summation of (e) for all HAPs in lbs/month;
- g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
- h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

#### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports for emissions unit P019, which include the following information:
  - a. An identification of each day during which the average hourly OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - b. An identification of each day during which the OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 40 pounds per day, and the actual OC emissions for each such day.

- c. An identification of each day during which the average hourly OC emissions generated by the operating scenario outlined in A.2.a.i. exceeded 7.36 pounds per hour, and the actual average hourly OC emissions for each such day.
2. The permittee shall submit annual written reports for emissions unit P019, of any deviation (excursion) from the annual emissions limitation of 14.3 tons OC/year.

These reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

3. The permittee shall submit deviation (excursion) reports for emissions units K004, P017-P028, as a group, which identify exceedances of any of the following:
  - a. Any exceedances of the maximum allowable gallon usage rates and VOC content limitations specified in paragraphs B.1. and B.2.; and
  - b. Any exceedances of the maximum emissions limitations for each HAP and total combined HAPs specified in paragraph B.3.
4. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit, unless otherwise specified.

## E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 7.36 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials.  
  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - b. Emission Limitation: 14.3 tons OC/yr from all coatings and cleanup materials.  
  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.2.
  - c. Emission Limitation: 8 lbs OC/hr, 40 lbs OC/day

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Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.

- d. Emission Limitation: Group limit of 93.86 tons VOC per rolling 12-month period based on coating usage and OC content restrictions

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.3.

- e. Emission Limitation: Group limit of 9.9 tons per rolling 12-month period of any individual HAP and 24.9 tons per rolling 12-month period of any combination of HAPs

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.5.

## F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The terms and conditions of this PTI shall supersede the terms and conditions for this emissions unit established by PTI application number 03-2993 issued on March 4, 1987.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P020 - Silk screen printing (1 DBO-B, formerly permitted as K002) modification (modified to establish synthetic minor requirements)	OAC rule 3745-31-05(A)(3)	7.36 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials (see A.2.a.i.)
	OAC rule 3745-21-07(G)(2)	14.3 tons OC/yr from all coatings and cleanup materials. (See A.2.a.iv.)
	OAC rule 3745-21-07(G)(2) OAC rule 3745-35-07(B): Synthetic minor for the purpose of limiting emissions to levels below Title V applicability thresholds	8 lbs OC/hr, 40 lbs OC/day(See A.2.a.)
		Group Limit for K004 and P017-P028: 93.86 tons OC per rolling 12-month period based on coating usage and OC content restrictions (see A.2.b.)
		Group Limit for K004 and P017-P028: 9.9 tons per rolling 12-month period of any individual HAP* and 24.9 tons per rolling 12-month period of any combination of HAPs (see A.2.b.)

\* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

**2. Additional Terms and Conditions**

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Emissions Unit ID: **P020**

- 2.a** Emissions unit P020 will be subject to the following emissions limitations based on the type of coating and cleanup materials employed on a given day:

- i. On days when exclusively non-photochemically reactive coatings and non-photochemically reactive cleanup materials are employed, OC emissions from the coating and cleanup operations are subject to an emissions limitation of 7.36 lbs OC/hr.
  - ii. On days when any portion of the coatings employed are photochemically reactive and the cleanup material is non-photochemically reactive, OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) are subject to an emissions limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 2,383 lbs/month.
  - iii. On days when all or a portion of the cleanup materials employed are photochemically reactive, all OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) and OC emissions from photochemically reactive cleanup materials employed are subject to an emission limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 2,383 lbs/month.
  - iv. Annual OC emissions cannot exceed 7.3 tons if photochemically reactive coatings and/or photochemically reactive cleanup materials are employed each and every day.
- 2.b** The permittee has requested federally enforceable limitations for emissions units K004 and P017-P028, of 93.86 tons VOC, 9.9 tons of any individual HAP, and 24.9 tons of combined HAPs per rolling, 12-month period, all based on content and gallon usage restrictions for the purpose of avoiding Title V applicability (see B.1, B.2 and B.3).

## **B. Operational Restrictions**

1. The permittee shall not employ any coating, as applied, in excess of 7.0 lbs VOC/gallon (process coatings) and 11.0 lbs VOC/gallon (machinist ink and/or special order process coatings).
2. The maximum annual coating usage for emissions units K004, P017-P028 combined shall not exceed any of the following:

- a. 3,050 gallons of coating with a maximum VOC content of 11.0 lbs/gallon of coating;
- b. 25,067 gallons of coating with a maximum VOC content of 7.0 lbs/gallon of coating;
- c. 25,067 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified in the table below:

**Maximum Allowable Cumulative Coating Usage (gallons)**

<b><u>Month(s)</u></b>	<b><u>&lt;11.0 lbs VOC/gal</u></b>	<b><u>&lt;7.0 lbs VOC/gal</u></b>	<b><u>Combined</u></b>
1-1	254	2,089	2,089
1-2	508	4,178	4,178
1-3	762	6,267	6,267
1-4	1,016	8,356	8,356
1-5	1,270	10,445	10,445
1-6	1,524	12,534	12,534
1-7	1,778	14,623	14,623
1-8	2,032	16,712	16,712
1-9	2,286	18,801	18,801
1-10	2,540	20,890	20,890
1-11	2,794	22,979	22,979
1-12	3,050	25,067	25,067

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

3. Combined annual HAP emissions from emissions units K004, P017-P028 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

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**Maximum Allowable Cumulative HAP Emission Rates (tons)**

<b>Month(s)</b>	<b>Individual HAP</b>	<b>Combined HAPs</b>
1-1	0.825	2.075
1-2	1.650	4.150
1-3	2.475	6.225
1-4	3.300	8.300
1-5	4.125	10.375
1-6	4.950	12.450
1-7	5.775	14.525
1-8	6.600	16.600
1-9	7.425	18.675
1-10	8.250	20.750
1-11	9.075	22.825
1-12	9.900	24.900

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations of 9.9 tons and 24.9 tons shall be based upon a rolling, 12-month summation of the monthly emission rates.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for emissions unit P020:
  - a. The company identification for each coating and cleanup material employed with an identification of whether each material is a photochemically reactive material.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The OC content of each coating and cleanup material, in pounds per gallon.
  - d. The total OC emission rate for all coatings and cleanup materials, i.e. (b) x (c) in pounds of OC per day calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii. above.
  - e. The total number of hours the emissions unit was in operation.
  - f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in

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pounds per hour (average) calculated consistent with the limitations specified in paragraphs A.2.a.i. 0 A.2.a.iii. above.

2. The permittee shall collect and record the following information each month for emissions unit P020:
  - a. The company identification for each coating and cleanup material employed.
  - b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material.
  - c. The number of gallons of each coating and cleanup material employed.
  - d. The OC content of each coating and cleanup material, in lbs/gallon.
  - e. The OC emission rate for each coating and cleanup material, (c) x (d) in lbs/month.
  - f. The total OC emission rate for all coating and cleanup materials, sum of (e) in lbs/month.
  - g. The annual, year to date OC emission rate from all coating and cleanup material usage, sum of (f) for each calendar month to date from January to December.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for emissions units K004, P017-P028, as a group:
  - a. the company identification for each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material, in pounds per gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emission rate for each coating and cleanup material, i.e. (b) x (c) x 1 ton/2000 lbs., in tons per month;
  - e. the total VOC emission rate for all coatings and cleanup materials, i.e. the summation of (d), in tons per month;

- f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of VOC, in tons per month; and,
  - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of VOC, based on a rolling, 12-month summation.
4. In addition to the above information, the permittee shall also record the following information for each month for emissions units K004, P017-P028, as a group:
- a. for the first 12 months of operation under the provisions of this permit:
    - i. the cumulative gallon usage rate for each coating;
    - ii. the total number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the total number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating; and,
    - iv. the total number of gallons of all coatings.
  - b. after the first 12 months of operation under the provisions of this permit:
    - i. the annual\* number of gallons of each coating;
    - ii. the annual\* number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the annual\* number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating;
    - iv. the annual\* number of gallons of all coatings.

\*Based upon a rolling, 12-month summation of the coating usage rates.

Note: The coating information recorded above must be for the materials employed, including any thinning solvents added at the emissions unit.

5. The permittee shall collect and the following information regarding HAPs emissions each month for emissions units K004, P017-P028, as a group;

- a. the name and identification of each coating and cleanup material employed;
- b. the pounds per gallon of each HAP from each coating and cleanup material, as applied;
- c. the number of gallons of each coating and cleanup material employed;
- d. the emission rate for each HAP from each coating and cleanup material employed, i.e. (b) x (c), for each HAP in lbs/month;
- e. the total emission rate for each HAP from all coatings and cleanup materials employed, i.e. the summation of (d) for each HAP, in lbs/month;
- f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup material employed, i.e. the summation of (e) for all HAPs in lbs/month;
- g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
- h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emissions unit P020, which include the following information:
  - a. An identification of each day during which the average hourly OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - b. An identification of each day during which the organic compound emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 40 pounds per day, and the actual OC emissions for each such day.

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- c. An identification of each day during which the average hourly OC emissions generated by the operating scenario outlined in A.2.a.i. exceeded 7.36 pounds per hour, and the actual average hourly OC emissions for each such day.
2. The permittee shall submit annual written reports for emissions unit P020, of any deviation (excursion) from the annual emissions limitation of 14.3 tons OC/year.

These reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

3. The permittee shall submit deviation (excursion) reports for emissions units K004, P017-P028, as a group, which identify exceedances of any of the following:
  - a. Any exceedances of the maximum allowable gallon usage rates and VOC content limitations specified in paragraphs B.1. and B.2.; and
  - b. Any exceedances of the maximum emissions limitations for each HAP and total combined HAPs specified in paragraph B.3.
4. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit, unless otherwise specified.

#### E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 7.36 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials.  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - b. Emission Limitation: 14.3 tons OC/yr from all coatings and cleanup materials.  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.2.
  - c. Emission Limitation: 8 lbs OC/hr, 40 lbs OC/day  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - d. Emission Limitation: Group limit of 93.86 tons VOC per rolling 12-month period based on coating usage and OC content restrictions

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Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.3.

- e. Emission Limitation: Group limit of 9.9 tons per rolling 12-month period of any individual HAP and 24.9 tons per rolling 12-month period of any combination of HAPs

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.5.

#### **F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The terms and conditions of this PTI shall supersede the terms and conditions for this emissions unit established by PTI application number 03-2993 issued on March 4, 1987.

Issued: February 27, 2001

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P021 - Silk screen printing (5 DBO-A, formerly permitted as K003) modification (modified to establish synthetic minor requirements)	OAC rule 3745-31-05(A)(3)	7.36 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials. (See A.2.a.i.)
	OAC rule 3745-21-07(G)(2)	14.3 tons OC/yr from all coatings and cleanup materials (See A.2.a.iv.)
	OAC rule 3745-35-07(B): Synthetic minor for the purpose of limiting emissions to levels below Title V applicability thresholds	8 lbs OC/hr, 40 lbs OC/day (See A.2.a.)
		Group Limit for K004 and P017-P028: 93.86 tons OC per rolling 12-month period based on coating usage and OC content restrictions (see A.2.b.)
		Group Limit for K004 and P017-P028: 9.9 tons per rolling 12-month period of any individual HAP* and 24.9 tons per rolling 12-month period of any combination of HAPs (see A.2.b.)

\* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

**PPG Industries Inc - Crestline**  
**PTI**  
**Issue**

**Facility ID: 0370000217**

Emissions Unit ID: **P021**

**2. Additional Terms and Conditions**

- 2.a** Emissions unit P021 will be subject to the following emissions limitations based on the type of coating and cleanup materials employed on a given day:

- i. On days when exclusively non-photochemically reactive coatings and non-photochemically reactive cleanup materials are employed, OC emissions from the coating and cleanup operations are subject to an emissions limitation of 7.36 lbs OC/hr.
  - ii. On days when any portion of the coatings employed are photochemically reactive and the cleanup material is non-photochemically reactive, OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) are subject to an emissions limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 2,383 lbs/month.
  - iii. On days when all or a portion of the cleanup materials employed are photochemically reactive, all OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) and OC emissions from photochemically reactive cleanup materials employed are subject to an emission limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 2,383 lbs/month.
  - iv. Annual OC emissions cannot exceed 7.3 tons if photochemically reactive coatings and/or photochemically reactive cleanup materials are employed each and every day.
- 2.b** The permittee has requested federally enforceable limitations for emissions units K004 and P017-P028, of 93.86 tons VOC, 9.9 tons of any individual HAP, and 24.9 tons of combined HAPs, all based on content and gallon usage restrictions for the purpose of avoiding Title V applicability (see B.1, B.2 and B.3).

## **B. Operational Restrictions**

1. The permittee shall not employ any coating, as applied, in excess of 7.0 lbs VOC/gallon (process coatings) and 11.0 lbs VOC/gallon (machinist ink and/or special order process coatings).
2. The maximum annual coating usage for emissions units K004, P017-P028 combined shall not exceed any of the following:

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- a. 3050 gallons of coating with a maximum VOC content of 11.0 lbs/gallon of coating;
- b. 25,067 gallons of coating with a maximum VOC content of 7.0 lbs/gallon of coating;
- c. 25,067 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified in the table below:

**Maximum Allowable Cumulative Coating Usage (gallons)**

<b><u>Month(s)</u></b>	<b><u>&lt;11.0 lbs VOC/gal</u></b>	<b><u>&lt;7.0 lbs VOC/gal</u></b>	<b><u>Combined</u></b>
1-1	254	2,089	2,089
1-2	508	4,178	4,178
1-3	762	6,267	6,267
1-4	1,016	8,356	8,356
1-5	1,270	10,445	10,445
1-6	1,524	12,534	12,534
1-7	1,778	14,623	14,623
1-8	2,032	16,712	16,712
1-9	2,286	18,801	18,801
1-10	2,540	20,890	20,890
1-11	2,794	22,979	22,979
1-12	3,050	25,067	25,067

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

3. Combined annual HAP emissions from emissions units K004, P017-P028 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

**Maximum Allowable Cumulative HAP Emission Rates (tons)**

<b>Month(s)</b>	<b>Individual HAP</b>	<b>Combined HAPs</b>
1-1	0.825	2.075
1-2	1.650	4.150
1-3	2.475	6.225
1-4	3.300	8.300
1-5	4.125	10.375
1-6	4.950	12.450
1-7	5.775	14.525
1-8	6.600	16.600
1-9	7.425	18.675
1-10	8.250	20.750
1-11	9.075	22.825
1-12	9.900	24.900

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations of 9.9 tons and 24.9 tons shall be based upon a rolling, 12-month summation of the monthly emission rates.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for emissions unit P021:
  - a. The company identification for each coating and cleanup material employed with an identification of whether each material is a photochemically reactive material.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The OC content of each coating and cleanup material, in pounds per gallon.
  - d. The total OC emission rate for all coatings and cleanup materials, i.e. (b) x (c) in pounds of OC per day calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii. above.
  - e. The total number of hours the emissions unit was in operation.
  - f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in

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pounds per hour (average) calculated consistent with the limitations specified in paragraphs A.2.a.i. 0 A.2.a.iii. above.

2. The permittee shall collect and record the following information each month for emissions unit P021:
  - a. The company identification for each coating and cleanup material employed.
  - b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material.
  - c. The number of gallons of each coating and cleanup material employed.
  - d. The OC content of each coating and cleanup material, in lbs/gallon.
  - e. The OC emission rate for each coating and cleanup material, (c) x (d) in lbs/month.
  - f. The total OC emission rate for all coating and cleanup materials, sum of (e) in lbs/month.
  - g. The annual, year to date OC emission rate from all coating and cleanup material usage, sum of (f) for each calendar month to date from January to December.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for emissions units K004, P017-P028, as a group:
  - a. the company identification for each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material, in pounds per gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emission rate for each coating and cleanup material, (b) x (c) x 1 ton/2000 lbs., in tons per month;
  - e. the total VOC emission rate for all coatings and cleanup materials, i.e. the summation of (d), in tons per month;

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- f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of VOC, in tons per month; and,
  - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of VOC, based on a rolling, 12-month summation.
4. In addition to the above information, the permittee shall also record the following information for each month for emissions units K004, P017-P028, as a group:
- a. for the first 12 months of operation under the provisions of this permit:
    - i. the cumulative gallon usage rate for each coating;
    - ii. the total number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the total number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating; and,
    - iv. the total number of gallons of all coatings.
  - b. after the first 12 months of operation under the provisions of this permit:
    - i. the annual\* number of gallons of each coating;
    - ii. the annual\* number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the annual\* number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating;
    - iv. the annual\* number of gallons of all coatings.

\*Based upon a rolling, 12-month summation of the coating emission rates.

Note: The coating information recorded above must be for the materials employed, including any thinning solvents added at the emissions unit.

5. The permittee shall collect and the following information regarding HAPs emissions each month

for emissions units K004, P017-P028, as a group;

- a. the name and identification of each coating and cleanup material employed;
- b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
- c. the number of gallons of each coating and cleanup material employed;
- d. the emission rate for each HAP from each coating and cleanup material employed, i.e. (b) x (c), for each HAP in lbs/month;
- e. the total emission rate for each HAP from all coatings and cleanup materials employed, i.e. the summation of (d) for each HAP, in lbs/month;
- f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, i.e. the summation of (e) for all HAPs in lbs/month;
- g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
- h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emissions unit P021, which include the following information:
  - a. An identification of each day during which the average hourly OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - b. An identification of each day during which the OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 40 pounds per day, and the actual OC emissions for each such day.

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- c. An identification of each day during which the average hourly OC emissions generated by the operating scenario outlined in A.2.a.i. exceeded 7.36 pounds per hour, and the actual average hourly OC emissions for each such day.
2. The permittee shall submit annual written reports for emissions unit P021, of any deviation (excursion) from the annual emissions limitation of 14.3 tons OC/year.

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These reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

3. The permittee shall submit deviation (excursion) reports for emissions units K004, P017-P028, as a group, which identify exceedances of any of the following:
  - a. Any exceedances of the maximum allowable gallon usage rates and VOC content limitations specified in paragraphs B.1. and B.2.; and
  - b. Any exceedances of the maximum emissions limitations for each HAP and total combined HAPs specified in paragraph B.3.
4. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit, unless otherwise specified.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 7.36 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials.  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - b. Emission Limitation: 14.3 tons OC/yr from all coatings and cleanup materials.  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.2.
  - c. Emission Limitation: 8 lbs OC/hr, 40 lbs OC/day  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - d. Emission Limitation: Group limit of 93.86 tons VOC per rolling 12-month period based on coating usage and OC content restrictions

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.3.

- e. Emission Limitation: Group limit of 9.9 tons per rolling 12-month period of any individual HAP and 24.9 tons per rolling 12-month period of any combination of HAPs

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.5.

#### F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The terms and conditions of this PTI shall supersede the terms and conditions for this emissions unit established by PTI application number 03-4421 issued on September 20, 1989.

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Emissions Unit ID: P022

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P022 - Silk screen printing (5 DBO-B, formerly permitted as K003) modification (modified to establish synthetic minor requirements)	OAC rule 3745-31-05(A)(3)	7.36 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials. (See A.2.a.i.)
	OAC rule 3745-21-07(G)(2)	14.3 tons OC /yr from all coatings and cleanup materials (See A.2.a.iv.)
	OAC rule 3745-35-07(B): Synthetic minor for the purpose of limiting emissions to levels below Title V applicability thresholds	8 lbs OC/hr, 40 lbs OC/day (See A.2.a.)
		Group Limit for K004 and P017-P028: 93.86 tons OC per rolling 12-month period based on coating usage and VOC content restrictions (see A.2.b)
		Group Limit for K004 and P017-P028: 9.9 tons per rolling 12-month period of any individual HAP* and 24.9 tons per rolling 12-month period of any combination of HAPs (see A.2.b)

\* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

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**2. Additional Terms and Conditions**

- 2.a** Emissions unit P022 will be subject to the following emissions limitations based on the type of coating and cleanup materials employed on a given day:

- i. On days when exclusively non-photochemically reactive coatings and non-photochemically reactive cleanup materials are employed, OC emissions from the coating and cleanup operations are subject to an emissions limitation of 7.36 lbs OC/hr.
  - ii. On days when any portion of the coatings employed are photochemically reactive and the cleanup material is non-photochemically reactive, OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) are subject to an emissions limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 2,383 lbs/month.
  - iii. On days when all or a portion of the cleanup materials employed are photochemically reactive, all OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) and OC emissions from photochemically reactive cleanup materials employed are subject to an emission limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 2,383 lbs/month.
  - iv. Annual OC emissions cannot exceed 7.3 tons if photochemically reactive coatings and/or photochemically reactive cleanup materials are employed each and every day.
- 2.b** The permittee has requested federally enforceable limitations for emissions units K004 and P017-P028, of 93.86 tons VOC, 9.9 tons of any individual HAP, and 24.9 tons of combined HAPs, all based on content and gallon usage restrictions for the purpose of avoiding Title V applicability (see B.1, B.2 and B.3).

## **B. Operational Restrictions**

1. The permittee shall not employ any coating, as applied, in excess of 7.0 lbs VOC/gallon (process coatings) and 11.0 lbs VOC/gallon (machinist ink and/or special order process coatings).
2. The maximum annual coating usage for emissions units K004, P017-P028 combined shall not exceed any of the following:

- a. 3,050 gallons of coating with a maximum VOC content of 11.0 lbs/gallon of coating;
- b. 25,067 gallons of coating with a maximum VOC content of 7.0 lbs/gallon of coating;
- c. 25,067 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified in the table below:

**Maximum Allowable Cumulative Coating Usage (gallons)**

<b><u>Month(s)</u></b>	<b><u>&lt;11.0 lbs VOC/gal</u></b>	<b><u>&lt;7.0 lbs VOC/gal</u></b>	<b><u>Combined</u></b>
1-1	254	2,089	2,089
1-2	508	4,178	4,178
1-3	762	6,267	6,267
1-4	1,016	8,356	8,356
1-5	1,270	10,445	10,445
1-6	1,524	12,534	12,534
1-7	1,778	14,623	14,623
1-8	2,032	16,712	16,712
1-9	2,286	18,801	18,801
1-10	2,540	20,890	20,890
1-11	2,794	22,979	22,979
1-12	3,050	25,067	25,067

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

- 3. Combined annual HAP emissions from emissions units K004, P017-P028 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

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**Maximum Allowable Cumulative HAP Emission Rates (tons)**

<b>Month(s)</b>	<b>Individual HAP</b>	<b>Combined HAPs</b>
1-1	0.825	2.075
1-2	1.650	4.150
1-3	2.475	6.225
1-4	3.300	8.300
1-5	4.125	10.375
1-6	4.950	12.450
1-7	5.775	14.525
1-8	6.600	16.600
1-9	7.425	18.675
1-10	8.250	20.750
1-11	9.075	22.825
1-12	9.900	24.900

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations of 9.9 tons and 24.9 tons shall be based upon a rolling, 12-month summation of the monthly emission rates.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for emissions unit P022:
  - a. The company identification for each coating and cleanup material employed with an identification of whether each material is a photochemically reactive material.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The OC content of each coating and cleanup material, in pounds per gallon.
  - d. The total OC emission rate for all coatings and cleanup materials, i.e. (b) x (c) in pounds of OC per day calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii. above.
  - e. The total number of hours the emissions unit was in operation.
  - f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in

pounds per hour (average) calculated consistent with the limitations specified in paragraphs A.2.a.i. 0 A.2.a.iii. above.

2. The permittee shall collect and record the following information each month for emissions unit P022:
  - a. The company identification for each coating and cleanup material employed.
  - b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material.
  - c. The number of gallons of each coating and cleanup material employed.
  - d. The OC content of each coating and cleanup material, in lbs/gallon.
  - e. The OC emission rate for each coating and cleanup material, (c) x (d) in lbs/month.
  - f. The total OC emission rate for all coating and cleanup materials, sum of (e) in lbs/month.
  - g. The annual, year to date OC emission rate from all coating and cleanup material usage, sum of (f) for each calendar month to date from January to December.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for emissions units K004, P017-P028, as a group:
  - a. the company identification for each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material, in pounds per gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emission rate for each coating and cleanup material, (b) x (c) x 1 ton/2000 lbs., in tons per month;
  - e. the total VOC emission rate for all coatings and cleanup materials, i.e. the summation of (d), in tons per month;

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- f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of VOC, in tons per month; and,
  - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of VOC, based on a rolling, 12-month summation.
4. In addition to the above information, the permittee shall also record the following information for each month for emissions units K004, P017-P028, as a group:
- a. for the first 12 months of operation under the provisions of this permit:
    - i. the cumulative gallon usage rate for each coating;
    - ii. the total number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the total number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating; and,
    - iv. the total number of gallons of all coatings.
  - b. after the first 12 months of operation under the provisions of this permit:
    - i. the annual\* number of gallons of each coating;
    - ii. the annual\* number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the annual\* number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating;
    - iv. the annual\* number of gallons of all coatings.

\*Based upon a rolling, 12-month summation of the coating emission rates.

Note: The coating information recorded above must be for the materials employed, including any thinning solvents added at the emissions unit.

5. The permittee shall collect and the following information regarding HAPs emissions each month for emissions units K004, P017-P028, as a group;

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- a. the name and identification of each coating and cleanup material employed;
- b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
- c. the number of gallons of each coating and cleanup material employed;
- d. the emission rate for each HAP from each coating and cleanup material employed, i.e. (b) x (c), for each HAP in lbs/month;
- e. the total emission rate for each HAP from all coatings and cleanup materials employed, i.e. the summation of (d) for each HAP, in lbs/month;
- f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, i.e. the summation of (e) for all HAPs in lbs/month;
- g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
- h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emissions unit P022, which include the following information:
  - a. An identification of each day during which the average hourly OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - b. An identification of each day during which the OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 40 pounds per day, and the actual OC emissions for each such day.

- c. An identification of each day during which the average hourly OC emissions generated by the operating scenario outlined in A.2.a.i. exceeded 7.36 pounds per hour, and the actual average hourly OC emissions for each such day.
2. The permittee shall submit annual written reports for emissions unit P022, of any deviation (excursion) from the annual emissions limitation of 14.3 tons OC/year.

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These reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

3. The permittee shall submit deviation (excursion) reports for emissions units K004, P017-P028, as a group, which identify exceedances of any of the following:
  - a. Any exceedances of the maximum allowable gallon usage rates and VOC content limitations specified in paragraphs B.1. and B.2.; and
  - b. Any exceedances of the maximum emissions limitations for each HAP and total combined HAPs specified in paragraph B.3.
4. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit, unless otherwise specified.

#### E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 7.36 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials.  
  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - b. Emission Limitation: 14.3 tons OC/yr from all coatings and cleanup materials.  
  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.2.
  - c. Emission Limitation: 8 lbs OC/hr, 40 lbs OC/day  
  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - d. Emission Limitation: Group limit of 93.86 tons VOC per rolling 12-month period based on coating usage and OC content restrictions

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Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.3.

- e. Emission Limitation: Group limit of 9.9 tons per rolling 12-month period of any individual HAP and 24.9 tons per rolling 12-month period of any combination of HAPs

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.5.

#### **F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The terms and conditions of this PTI shall supersede the terms and conditions for this emissions unit established by PTI application number 03-4421 issued on September 20, 1989.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P023 - Silk screen printing (2 VAW, formerly permitted as R004) modification (modified to establish synthetic minor requirements)	OAC rule 3745-31-05(A)(3)	6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials. (See A.2.a.i.)
	OAC rule 3745-21-07(G)(2)	8.8 tons OC/yr from all coatings and cleanup materials (See A.2.a.iv.)
	OAC rule 3745-35-07(B): Synthetic minor for the purpose of limiting emissions to levels below Title V applicability thresholds	8 lbs OC/hr, 40 lbs OC/day (See A.2.a.)
		Group Limit for K004 and P017-P028: 93.86 tons OC per rolling 12-month period based on coating usage and OC content restrictions (See A.2.b.)
		Group Limit for K004 and P017-P028: 9.9 tons per rolling 12-month period of any individual HAP* and 24.9 tons per rolling 12-month period of any combination of HAPs (See A.2.b.)

\* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

**2. Additional Terms and Conditions**

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Emissions Unit ID: **P023**

- 2.a** Emissions unit P023 will be subject to the following emissions limitations based on the type of coating and cleanup materials employed on a given day:

- i. On days when exclusively non-photochemically reactive coatings and non-photochemically reactive cleanup materials are employed, OC emissions from the coating and cleanup operations are subject to an emissions limitation of 6.45 lbs OC/hr.
  - ii. On days when any portion of the coatings employed are photochemically reactive and the cleanup material is non-photochemically reactive, OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) are subject to an emissions limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 1,467 lbs/month.
  - iii. On days when all or a portion of the cleanup materials employed are photochemically reactive, all OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) and OC emissions from photochemically reactive cleanup materials employed are subject to an emission limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 1,467 lbs/month.
  - iv. Annual OC emissions cannot exceed 7.3 tons if photochemically reactive coatings and/or photochemically reactive cleanup materials are employed each and every day.
- 2.b** The permittee has requested federally enforceable limitations for emissions units K004 and P017-P028, of 93.86 tons VOC, 9.9 tons of any individual HAP, and 24.9 tons of combined HAPs, all based on content and gallon usage restrictions for the purpose of avoiding Title V applicability (see B.1, B.2 and B.3).

## **B. Operational Restrictions**

1. The permittee shall not employ any coating, as applied, in excess of 7.0 lbs VOC/gallon (process coatings) and 11.0 lbs VOC/gallon (machinist ink and/or special order process coatings).
2. The maximum annual coating usage for emissions units K004, P017-P028 combined shall not exceed any of the following:

- a. 3,050 gallons of coating with a maximum VOC content of 11.0 lbs/gallon of coating;
- b. 25,067 gallons of coating with a maximum VOC content of 7.0 lbs/gallon of coating;
- c. 25,067 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified in the table below:

**Maximum Allowable Cumulative Coating Usage (gallons)**

<b><u>Month(s)</u></b>	<b><u>&lt;11.0 lbs VOC/gal</u></b>	<b><u>&lt;7.0 lbs VOC/gal</u></b>	<b><u>Combined</u></b>
1-1	254	2,089	2,089
1-2	508	4,178	4,178
1-3	762	6,267	6,267
1-4	1,016	8,356	8,356
1-5	1,270	10,445	10,445
1-6	1,524	12,534	12,534
1-7	1,778	14,623	14,623
1-8	2,032	16,712	16,712
1-9	2,286	18,801	18,801
1-10	2,540	20,890	20,890
1-11	2,794	22,979	22,979
1-12	3,050	25,067	25,067

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

- 3. Combined annual HAP emissions from emissions units K004, P017-P028 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

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**Maximum Allowable Cumulative HAP Emission Rates (tons)**

<b>Month(s)</b>	<b>Individual HAP</b>	<b>Combined HAPs</b>
1-1	0.825	2.075
1-2	1.650	4.150
1-3	2.475	6.225
1-4	3.300	8.300
1-5	4.125	10.375
1-6	4.950	12.450
1-7	5.775	14.525
1-8	6.600	16.600
1-9	7.425	18.675
1-10	8.250	20.750
1-11	9.075	22.825
1-12	9.900	24.900

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations of 9.9 tons and 24.9 tons shall be based upon a rolling, 12-month summation of the monthly emission rates.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for emissions unit P023:
  - a. The company identification for each coating and cleanup material employed with an identification of whether each material is a photochemically reactive material.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The OC content of each coating and cleanup material, in pounds per gallon.
  - d. The total OC emission rate for all coatings and cleanup materials, i.e. (b) x (c) in pounds of OC per day calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii. above.
  - e. The total number of hours the emissions unit was in operation.
  - f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in

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pounds per hour (average) calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii. above.

2. The permittee shall collect and record the following information each month for emissions unit P023:
  - a. The company identification for each coating and cleanup material employed.
  - b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material.
  - c. The number of gallons of each coating and cleanup material employed.
  - d. The OC content of each coating and cleanup material, in lbs/gallon.
  - e. The OC emission rate for each coating and cleanup material, (c) x (d) in lbs/month.
  - f. The total OC emission rate for all coating and cleanup materials, sum of (e) in lbs/month.
  - g. The annual, year to date OC emission rate from all coating and cleanup material usage, sum of (f) for each calendar month to date from January to December.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for emissions units K004, P017-P028, as a group:
  - a. the company identification for each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material, in pounds per gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emission rate for each coating and cleanup material, (b) x (c) x 1 ton/2000 lbs., in tons per month;
  - e. the total VOC emission rate for all coatings and cleanup materials, i.e. the summation of (d), in tons per month;

- f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of VOC, in tons per month; and,
  - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of VOC, based on a rolling, 12-month summation.
4. In addition to the above information, the permittee shall also record the following information for each month for emissions units K004, P017-P028, as a group:
- a. for the first 12 months of operation under the provisions of this permit:
    - i. the cumulative gallon usage rate for each coating;
    - ii. the total number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the total number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating; and,
    - iv. the total number of gallons of all coatings.
  - b. after the first 12 months of operation under the provisions of this permit:
    - i. the annual\* number of gallons of each coating;
    - ii. the annual\* number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the annual\* number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating;
    - iv. the annual\* number of gallons of all coatings.

\*Based upon a rolling, 12-month summation of the coating emission rates.

Note: The coating information recorded above must be for the materials employed, including any thinning solvents added at the emissions unit.

5. The permittee shall collect and the following information regarding HAPs emissions each month for emissions units K004, P017-P028, as a group;

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- a. the name and identification of each coating and cleanup material employed;
- b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
- c. the number of gallons of each coating and cleanup material employed;
- d. the emission rate for each HAP from each coating and cleanup material employed, i.e. (b) x (c), for each HAP in lbs/month;
- e. the total emission rate for each HAP from all coatings and cleanup materials employed, i.e. the summation of (d) for each HAP, in lbs/month;
- f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, i.e. the summation of (e) for all HAPs in lbs/month;
- g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
- h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emissions unit P023, which include the following information:
  - a. An identification of each day during which the average hourly OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - b. An identification of each day during which the OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 40 pounds per day, and the actual OC emissions for each such day.

- c. An identification of each day during which the average hourly OC emissions generated by the operating scenario outlined in A.2.a.i. exceeded 6.45 pounds per hour, and the actual average hourly OC emissions for each such day.
  2. The permittee shall submit annual written reports for emissions unit P023, of any deviation (excursion) from the annual emissions limitation of 8.8 tons OC/year.

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These reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

3. The permittee shall submit deviation (excursion) reports for emissions units K004, P017-P028, as a group, which identify exceedances of any of the following:
  - a. Any exceedances of the maximum allowable gallon usage rates and VOC content limitations specified in paragraphs B.1. and B.2.; and
  - b. Any exceedances of the maximum emissions limitations for each HAP and total combined HAPs specified in paragraph B.3.
4. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit, unless otherwise specified.

#### E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials.  
  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - b. Emission Limitation: 8.8 tons OC/yr from all coatings and cleanup materials.  
  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.2.
  - c. Emission Limitation: 8 lbs OC/hr, 40 lbs OC/day  
  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - d. Emission Limitation: Group limit of 93.86 tons VOC per rolling 12-month period based on coating usage and OC content restrictions

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Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.3.

- e. Emission Limitation: Group limit of 9.9 tons per rolling 12-month period of any individual HAP and 24.9 tons per rolling 12-month period of any combination of HAPs

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.5.

#### **F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The terms and conditions of this PTI shall supersede the terms and conditions for this emissions unit established by PTI application number 03-7233 issued on May 19, 1993.

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Emissions Unit ID: P024

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P024 - Silk screen printing (21 HPB, formerly permitted as R005) modification (modified to establish synthetic minor requirements)	OAC rule 3745-31-05(A)(3)	6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials. (See A.2.a.i.)
	OAC rule 3745-21-07(G)(2)	12.6 tons OC/yr from all coatings and cleanup materials (See A.2.a.iv.)
	OAC rule 3745-35-07(B): Synthetic minor for the purpose of limiting emissions to levels below Title V applicability	8 lbs OC/hr, 40 lbs OC/day (See A.2.a.)
		Group Limit for K004 and P017-P028: 93.86 tons OC per rolling 12-month period based on coating usage and OC content restrictions (see A.2.b.)
		Group Limit for K004 and P017-P028: 9.9 tons per rolling 12-month period of any individual HAP* and 24.9 tons per rolling 12-month period of any combination of HAPs (see A.2.b.)

\* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

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**PTI A**  
**Issue**

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**2. Additional Terms and Conditions**

- 2.a** Emissions unit P024 will be subject to the following emissions limitations based on the type of coating and cleanup materials employed on a given day:

- i. On days when exclusively non-photochemically reactive coatings and non-photochemically reactive cleanup materials are employed, OC emissions from the coating and cleanup operations are subject to an emissions limitation of 6.45 lbs OC/hr.
  - ii. On days when any portion of the coatings employed are photochemically reactive and the cleanup material is non-photochemically reactive, OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) are subject to an emissions limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 2,100 lbs/month.
  - iii. On days when all or a portion of the cleanup materials employed are photochemically reactive, all OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) and OC emissions from photochemically reactive cleanup materials employed are subject to an emission limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 2,100 lbs/month.
  - iv. Annual OC emissions cannot exceed 7.3 tons if photochemically reactive coatings and/or photochemically reactive cleanup materials are employed each and every day.
- 2.b** The permittee has requested federally enforceable limitations for emissions units K004 and P017-P028, of 93.86 tons VOC, 9.9 tons of any individual HAP, and 24.9 tons of combined HAPs, all based on content and gallon usage restrictions for the purpose of avoiding Title V applicability (see B.1, B.2 and B.3).

## **B. Operational Restrictions**

1. The permittee shall not employ any coating, as applied, in excess of 7.0 lbs VOC/gallon (process coatings) and 11.0 lbs VOC/gallon (machinist ink and/or special order process coatings).
2. The maximum annual coating usage for emissions units K004, P017-P028 combined shall not exceed any of the following:

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- a. 3,050 gallons of coating with a maximum VOC content of 11.0 lbs/gallon of coating;
- b. 25,067 gallons of coating with a maximum VOC content of 7.0 lbs/gallon of coating;
- c. 25,067 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified in the table below:

**Maximum Allowable Cumulative Coating Usage (gallons)**

<b><u>Month(s)</u></b>	<b><u>&lt;11.0 lbs VOC/gal</u></b>	<b><u>&lt;7.0 lbs VOC/gal</u></b>	<b><u>Combined</u></b>
1-1	254	2,089	2,089
1-2	508	4,178	4,178
1-3	762	6,267	6,267
1-4	1,016	8,356	8,356
1-5	1,270	10,445	10,445
1-6	1,524	12,534	12,534
1-7	1,778	14,623	14,623
1-8	2,032	16,712	16,712
1-9	2,286	18,801	18,801
1-10	2,540	20,890	20,890
1-11	2,794	22,979	22,979
1-12	3,050	25,067	25,067

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

3. Combined annual HAP emissions from emissions units K004, P017-P028 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:



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pounds per hour (average) calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii. above.

2. The permittee shall collect and record the following information each month for emissions unit P024:
  - a. The company identification for each coating and cleanup material employed.
  - b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material.
  - c. The number of gallons of each coating and cleanup material employed.
  - d. The OC content of each coating and cleanup material, in lbs/gallon.
  - e. The OC emission rate for each coating and cleanup material, (c) x (d) in lbs/month.
  - f. The total OC emission rate for all coating and cleanup materials, sum of (e) in lbs/month.
  - g. The annual, year to date OC emission rate from all coating and cleanup material usage, sum of (f) for each calendar month to date from January to December.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for emissions units K004, P017-P028, as a group:
  - a. the company identification for each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material, in pounds per gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emission rate for each coating and cleanup material, (b) x (c) x 1 ton/2000 lbs., in tons per month;
  - e. the total VOC emission rate for all coatings and cleanup materials, i.e. the summation of (d), in tons per month;

- f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of VOC, in tons per month; and,
  - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of VOC, based on a rolling, 12-month summation.
4. In addition to the above information, the permittee shall also record the following information for each month for emissions units K004, P017-P028, as a group:
- a. for the first 12 months of operation under the provisions of this permit:
    - i. the cumulative gallon usage rate for each coating;
    - ii. the total number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the total number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating; and,
    - iv. the total number of gallons of all coatings.
  - b. after the first 12 months of operation under the provisions of this permit:
    - i. the annual\* number of gallons of each coating;
    - ii. the annual\* number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the annual\* number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating;
    - iv. the annual\* number of gallons of all coatings.

\*Based upon a rolling, 12-month summation of the coating emission rates.

Note: The coating information recorded above must be for the materials employed, including any thinning solvents added at the emissions unit.

5. The permittee shall collect and the following information regarding HAPs emissions each month for emissions units K004, P017-P028, as a group;

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- a. the name and identification of each coating and cleanup material employed;
- b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
- c. the number of gallons of each coating and cleanup material employed;
- d. the emission rate for each HAP from each coating and cleanup material employed, i.e. (b) x (c), for each HAP in lbs/month;
- e. the total emission rate for each HAP from all coatings and cleanup materials employed, i.e. the summation of (d) for each HAP, in lbs/month;
- f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, i.e. the summation of (e) for all HAPs in lbs/month;
- g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
- h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emissions unit P024, which include the following information:
  - a. An identification of each day during which the average hourly OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - b. An identification of each day during which the OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 40 pounds per day, and the actual OC emissions for each such day.

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- c. An identification of each day during which the average hourly OC emissions generated by the operating scenario outlined in A.2.a.i. exceeded 6.45 pounds per hour, and the actual average hourly OC emissions for each such day.
2. The permittee shall submit annual written reports for emissions unit P024, of any deviation (excursion) from the annual emissions limitation of 12.6 tons OC/year.

These reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

3. The permittee shall submit deviation (excursion) reports for emissions units K004, P017-P028, as a group, which identify exceedances of any of the following:
  - a. Any exceedances of the maximum allowable gallon usage rates and VOC content limitations specified in paragraphs B.1. and B.2.; and
  - b. Any exceedances of the maximum emissions limitations for each HAP and total combined HAPs specified in paragraph B.3.
4. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit, unless otherwise specified.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials.  
  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - b. Emission Limitation: 12.6 tons OC/yr from all coatings and cleanup materials.  
  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.2.
  - c. Emission Limitation: 8 lbs OC/hr, 40 lbs OC/day  
  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - d. Emission Limitation: Group limit of 93.86 tons VOC per rolling 12-month period based on coating usage and OC content restrictions

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Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.3.

- e. Emission Limitation: Group limit of 9.9 tons per rolling 12-month period of any individual HAP and 24.9 tons per rolling 12-month period of any combination of HAPs

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.5.

#### **F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The terms and conditions of this PTI shall supersede the terms and conditions for this emissions unit established by PTI application number 03-9057 issued on November 15, 1995.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P025 - Silk screen printing (20 HPB, formerly permitted as R006) modification (modified to establish synthetic minor requirements)	OAC rule 3745-31-05(A)(3)	6.45 lbs OC/hr when employing exclusively non-photochemically reactive coatings and cleanup materials. (See A.2.a.i.)
	OAC rule 3745-21-07(G)(2)	12.6 tons OC/yr from all coatings and cleanup materials (See A.2.a.iv.)
	OAC rule 3745-35-07(B): Synthetic minor for the purpose of limiting emissions to levels below Title V applicability thresholds	8 lbs OC/hr, 40 lbs OC/day (See A.2.a.)
		Group Limit for K004 and P017-P028: 93.86 tons OC per rolling 12-month period based on coating usage and OC content restrictions (see A.2.b.)
		Group Limit for K004 and P017-P028: 9.9 tons per rolling 12-month period of any individual HAP* and 24.9 tons per rolling 12-month period of any combination of HAPs (see A.2.b.)

\* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

**2. Additional Terms and Conditions**

- 2.a** Emissions unit P025 will be subject to the following emissions limitations based on the type of coating and cleanup materials employed on a given day:

- i. On days when exclusively non-photochemically reactive coatings and non-photochemically reactive cleanup materials are employed, OC emissions from the coating and cleanup operations are subject to an emissions limitation of 6.45 lbs OC/hr.
  - ii. On days when any portion of the coatings employed are photochemically reactive and the cleanup material is non-photochemically reactive, OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) are subject to an emissions limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 2,100 lbs/month.
  - iii. On days when all or a portion of the cleanup materials employed are photochemically reactive, all OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) and OC emissions from photochemically reactive cleanup materials employed are subject to an emission limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 2,100 lbs/month.
  - iv. Annual OC emissions cannot exceed 7.3 tons if photochemically reactive coatings and/or photochemically reactive cleanup materials are employed each and every day.
- 2.b** The permittee has requested federally enforceable limitations for emissions units K004 and P017-P028, of 93.86 tons VOC, 9.9 tons of any individual HAP, and 24.9 tons of combined HAPs, all based on content and gallon usage restrictions for the purpose of avoiding Title V applicability (see B.1, B.2 and B.3).

## **B. Operational Restrictions**

1. The permittee shall not employ any coating, as applied, in excess of 7.0 lbs VOC/gallon (process coatings) and 11.0 lbs VOC/gallon (machinist ink and/or special order process coatings).
2. The maximum annual coating usage for emissions units K004, P017-P028 combined shall not exceed any of the following:

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- a. 3,050 gallons of coating with a maximum VOC content of 11.0 lbs/gallon of coating;
- b. 25,067 gallons of coating with a maximum VOC content of 7.0 lbs/gallon of coating;
- c. 25,067 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified in the table below:

**Maximum Allowable Cumulative Coating Usage (gallons)**

<b><u>Month(s)</u></b>	<b><u>&lt;11.0 lbs VOC/gal</u></b>	<b><u>&lt;7.0 lbs VOC/gal</u></b>	<b><u>Combined</u></b>
1-1	254	2,089	2,089
1-2	508	4,178	4,178
1-3	762	6,267	6,267
1-4	1,016	8,356	8,356
1-5	1,270	10,445	10,445
1-6	1,524	12,534	12,534
1-7	1,778	14,623	14,623
1-8	2,032	16,712	16,712
1-9	2,286	18,801	18,801
1-10	2,540	20,890	20,890
1-11	2,794	22,979	22,979
1-12	3,050	25,067	25,067

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

3. Combined annual HAP emissions from emissions units K004, P017-P028 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:



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pounds per hour (average) calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii. above.

2. The permittee shall collect and record the following information each month for emissions unit P025:
  - a. The company identification for each coating and cleanup material employed.
  - b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material.
  - c. The number of gallons of each coating and cleanup material employed.
  - d. The OC content of each coating and cleanup material, in lbs/gallon.
  - e. The OC emission rate for each coating and cleanup material, (c) x (d) in lbs/month.
  - f. The total OC emission rate for all coating and cleanup materials, sum of (e) in lbs/month.
  - g. The annual, year to date OC emission rate from all coating and cleanup material usage, sum of (f) for each calendar month to date from January to December.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for emissions units K004, P017-P028, as a group:
  - a. the company identification for each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material, in pounds per gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emission rate for each coating and cleanup material, (b) x (c) x 1 ton/2000 lbs., in tons per month;
  - e. the total VOC emission rate for all coatings and cleanup materials, i.e. the summation of (d), in tons per month;

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- f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of VOC, in tons per month; and,
  - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of VOC, based on a rolling, 12-month summation.
4. In addition to the above information, the permittee shall also record the following information for each month for emissions units K004, P017-P028, as a group:
- a. for the first 12 months of operation under the provisions of this permit:
    - i. the cumulative gallon usage rate for each coating;
    - ii. the total number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the total number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating; and,
    - iv. the total number of gallons of all coatings.
  - b. after the first 12 months of operation under the provisions of this permit:
    - i. the annual\* number of gallons of each coating;
    - ii. the annual\* number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the annual\* number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating;
    - iv. the annual\* number of gallons of all coatings.

\*Based upon a rolling, 12-month summation of the coating emission rates.

Note: The coating information recorded above must be for the materials employed, including any thinning solvents added at the emissions unit.

5. The permittee shall collect and the following information regarding HAPs emissions each month

for emissions units K004, P017-P028, as a group;

- a. the name and identification of each coating and cleanup material employed;
- b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
- c. the number of gallons of each coating and cleanup material employed;
- d. the emission rate for each HAP from each coating and cleanup material employed, i.e. (b) x (c), for each HAP in lbs/month;
- e. the total emission rate for each HAP from all coatings and cleanup materials employed, i.e. the summation of (d) for each HAP, in lbs/month;
- f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, i.e. the summation of (e) for all HAPs in lbs/month;
- g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
- h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emissions unit P025, which include the following information:
  - a. An identification of each day during which the average hourly OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - b. An identification of each day during which the OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 40 pounds per day, and the actual OC emissions for each such day.

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- c. An identification of each day during which the average hourly OC emissions generated by the operating scenario outlined in A.2.a.i. exceeded 6.45 pounds per hour, and the actual average hourly OC emissions for each such day.
2. The permittee shall submit annual written reports for emissions unit P025, of any deviation (excursion) from the annual emissions limitation of 12.6 tons OC/year.

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These reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

3. The permittee shall submit deviation (excursion) reports for emissions units K004, P017-P028, as a group, which identify exceedances of any of the following:
  - a. Any exceedances of the maximum allowable gallon usage rates and VOC content limitations specified in paragraphs B.1. and B.2.; and
  - b. Any exceedances of the maximum emissions limitations for each HAP and total combined HAPs specified in paragraph B.3.
4. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit, unless otherwise specified.

#### E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials.  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - b. Emission Limitation: 12.6 tons OC/yr from all coatings and cleanup materials.  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.2.
  - c. Emission Limitation: 8 lbs OC/hr, 40 lbs OC/day  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - d. Emission Limitation: Group limit of 93.86 tons VOC per rolling 12-month period based on coating usage and OC content restrictions

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.3.

- e. Emission Limitation: Group limit of 9.9 tons per rolling 12-month period of any individual HAP and 24.9 tons per rolling 12-month period of any combination of HAPs

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.5.

#### F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The terms and conditions of this PTI shall supersede the terms and conditions for this emissions unit established by PTI application number 03-9057 issued on November 15, 1995.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P026 - Silk screen printing (6 VAW, formerly permitted as R007) modification (modified to establish synthetic minor requirements)	OAC rule 3745-31-05(A)(3)	6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials. (See A.2.a.i.)
	OAC rule 3745-21-07(G)(2)	8.8 tons OC/yr from all coatings and cleanup materials (See A.2.a.iv.)
	OAC rule 3745-35-07(B): Synthetic minor for the purpose of limiting emissions to levels below Title V applicability thresholds	8 lbs OC/hr, 40 lbs OC/day (See A.2.a.)
		Group Limit for K004 and P017-P028: 93.86 tons OC per rolling 12-month period based on coating usage and OC content restrictions (see A.2.b.)
		Group Limit for K004 and P017-P028: 9.9 tons per rolling 12-month period of any individual HAP* and 24.9 tons per rolling 12-month period of any combination of HAPs (see A.2.b.)

\* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

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Emissions Unit ID: **P026**

**2. Additional Terms and Conditions**

- 2.a** Emissions unit P026 will be subject to the following emissions limitations based on the type of coating and cleanup materials employed on a given day:

- i. On days when exclusively non-photochemically reactive coatings and non-photochemically reactive cleanup materials are employed, OC emissions from the coating and cleanup operations are subject to an emissions limitation of 6.45 lbs OC/hr.
  - ii. On days when any portion of the coatings employed are photochemically reactive and the cleanup material is non-photochemically reactive, OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) are subject to an emissions limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 1,467 lbs/month.
  - iii. On days when all or a portion of the cleanup materials employed are photochemically reactive, all OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) and OC emissions from photochemically reactive cleanup materials employed are subject to an emission limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 1,467 lbs/month.
  - iv. Annual OC emissions cannot exceed 7.3 tons if photochemically reactive coatings and/or photochemically reactive cleanup materials are employed each and every day.
- 2.b** The permittee has requested federally enforceable limitations for emissions units K004 and P017-P028, of 93.86 tons VOC, 9.9 tons of any individual HAP, and 24.9 tons of combined HAPs, all based on content and gallon usage restrictions for the purpose of avoiding Title V applicability (see B.1, B.2 and B.3).

## **B. Operational Restrictions**

1. The permittee shall not employ any coating, as applied, in excess of 7.0 lbs VOC/gallon (process coatings) and 11.0 lbs VOC/gallon (machinist ink and/or special order process coatings).
2. The maximum annual coating usage for emissions units K004, P017-P028 combined shall not exceed any of the following:

- a. 3,050 gallons of coating with a maximum VOC content of 11.0 lbs/gallon of coating;
- b. 25,067 gallons of coating with a maximum VOC content of 7.0 lbs/gallon of coating;
- c. 25,067 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified in the table below:

**Maximum Allowable Cumulative Coating Usage (gallons)**

<b><u>Month(s)</u></b>	<b><u>&lt;11.0 lbs VOC/gal</u></b>	<b><u>&lt;7.0 lbs VOC/gal</u></b>	<b><u>Combined</u></b>
1-1	254	2,089	2,089
1-2	508	4,178	4,178
1-3	762	6,267	6,267
1-4	1,016	8,356	8,356
1-5	1,270	10,445	10,445
1-6	1,524	12,534	12,534
1-7	1,778	14,623	14,623
1-8	2,032	16,712	16,712
1-9	2,286	18,801	18,801
1-10	2,540	20,890	20,890
1-11	2,794	22,979	22,979
1-12	3,050	25,067	25,067

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

- 3. Combined annual HAP emissions from emissions units K004, P017-P028 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

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**Maximum Allowable Cumulative HAP Emission Rates (tons)**

<b>Month(s)</b>	<b>Individual HAP</b>	<b>Combined HAPs</b>
1-1	0.825	2.075
1-2	1.650	4.150
1-3	2.475	6.225
1-4	3.300	8.300
1-5	4.125	10.375
1-6	4.950	12.450
1-7	5.775	14.525
1-8	6.600	16.600
1-9	7.425	18.675
1-10	8.250	20.750
1-11	9.075	22.825
1-12	9.900	24.900

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations of 9.9 tons and 24.9 tons shall be based upon a rolling, 12-month summation of the monthly emission rates.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for emissions unit P026:
  - a. The company identification for each coating and cleanup material employed with an identification of whether each material is a photochemically reactive material.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The OC content of each coating and cleanup material, in pounds per gallon.
  - d. The total OC emission rate for all coatings and cleanup materials, i.e. (b) x (c) in pounds of OC per day calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii. above.
  - e. The total number of hours the emissions unit was in operation.
  - f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in

pounds per hour (average) calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii. above.

2. The permittee shall collect and record the following information each month for emissions unit P026:
  - a. The company identification for each coating and cleanup material employed.
  - b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material.
  - c. The number of gallons of each coating and cleanup material employed.
  - d. The OC content of each coating and cleanup material, in lbs/gallon.
  - e. The OC emission rate for each coating and cleanup material, (c) x (d) in lbs/month.
  - f. The total OC emission rate for all coating and cleanup materials, sum of (e) in lbs/month.
  - g. The annual, year to date OC emission rate from all coating and cleanup material usage, sum of (f) for each calendar month to date from January to December.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for emissions units K004, P017-P028, as a group:
  - a. the company identification for each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material, in pounds per gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emission rate for each coating and cleanup material, (b) x (c) x 1 ton/2000 lbs., in tons per month;
  - e. the total VOC emission rate for all coatings and cleanup materials, i.e. the summation of (d), in tons per month;

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- f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of VOC, in tons per month; and,
  - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of VOC, based on a rolling, 12-month summation.
4. In addition to the above information, the permittee shall also record the following information for each month for emissions units K004, P017-P028, as a group:
- a. for the first 12 months of operation under the provisions of this permit:
    - i. the cumulative gallon usage rate for each coating;
    - ii. the total number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the total number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating; and,
    - iv. the total number of gallons of all coatings.
  - b. after the first 12 months of operation under the provisions of this permit:
    - i. the annual\* number of gallons of each coating;
    - ii. the annual\* number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the annual\* number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating;
    - iv. the annual\* number of gallons of all coatings.

\*Based upon a rolling, 12-month summation of the coating emission rates.

Note: The coating information recorded above must be for the materials employed, including any thinning solvents added at the emissions unit.

5. The permittee shall collect and the following information regarding HAPs emissions each month for emissions units K004, P017-P028, as a group;

- a. the name and identification of each coating and cleanup material employed;
- b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
- c. the number of gallons of each coating and cleanup material employed;
- d. the emission rate for each HAP from each coating and cleanup material employed, i.e. (b) x (c), for each HAP in lbs/month;
- e. the total emission rate for each HAP from all coatings and cleanup materials employed, i.e. the summation of (d) for each HAP, in lbs/month;
- f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, i.e. the summation of (e) for all HAPs in lbs/month;
- g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
- h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emissions unit P026, which include the following information:
  - a. An identification of each day during which the average hourly OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - b. An identification of each day during which the OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 40 pounds per day, and the actual OC emissions for each such day.

- c. An identification of each day during which the average hourly OC emissions generated by the operating scenario outlined in A.2.a.i. exceeded 6.45 pounds per hour, and the actual average hourly OC emissions for each such day.
  2. The permittee shall submit annual written reports for emissions unit P026, of any deviation (excursion) from the annual emissions limitation of 8.8 tons OC/year.

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These reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

3. The permittee shall submit deviation (excursion) reports for emissions units K004, P017-P028, as a group, which identify exceedances of any of the following:
  - a. Any exceedances of the maximum allowable gallon usage rates and VOC content limitations specified in paragraphs B.1. and B.2.; and
  - b. Any exceedances of the maximum emissions limitations for each HAP and total combined HAPs specified in paragraph B.3.
4. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit, unless otherwise specified.

#### E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials.  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - b. Emission Limitation: 8.8 tons OC/yr from all coatings and cleanup materials.  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.2.
  - c. Emission Limitation: 8 lbs OC/hr, 40 lbs OC/day  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - d. Emission Limitation: Group limit of 93.86 tons VOC per rolling 12-month period based on coating usage and OC content restrictions

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Emissions Unit ID: **P026**

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.3.

- e. Emission Limitation: Group limit of 9.9 tons per rolling 12-month period of any individual HAP and 24.9 tons per rolling 12-month period of any combination of HAPs

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.5.

#### **F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The terms and conditions of this PTI shall supersede the terms and conditions for this emissions unit established by PTI application number 03-9057 issued on November 15, 1995.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P027 - Silk screen printing (19 HPB-B, formerly permitted as R008) modification (modified to establish synthetic minor requirements)	OAC rule 3745-31-05(A)(3)	6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials. (See A.2.a.i.)
	OAC rule 3745-21-07(G)(2)	12.6 tons OC/yr from all coatings and cleanup materials. (See A.2.a.iv.)
	OAC rule 3745-21-07(G)(2) OAC rule 3745-35-07(B): Synthetic minor for the purpose of limiting emissions to levels below Title V applicability thresholds	8 lbs OC/hr, 40 lbs OC/day (See A.2.a.)
		Group Limit for K004 and P017-P028: 93.86 tons OC per rolling 12-month period based on coating usage and OC content restrictions (see A.2.b.)
		Group Limit for K004 and P017-P028: 9.9 tons per rolling 12-month period of any individual HAP* and 24.9 tons per rolling 12-month period of any combination of HAPs (see A.2.b.)

\* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

**2. Additional Terms and Conditions**

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Emissions Unit ID: **P027**

- 2.a** Emissions unit P027 will be subject to the following emissions limitations based on the type of coating and cleanup materials employed on a given day:

- i. On days when exclusively non-photochemically reactive coatings and non-photochemically reactive cleanup materials are employed, OC emissions from the coating and cleanup operations are subject to an emissions limitation of 6.45 lbs OC/hr.
  - ii. On days when any portion of the coatings employed are photochemically reactive and the cleanup material is non-photochemically reactive, OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) are subject to an emissions limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 2,100 lbs/month.
  - iii. On days when all or a portion of the cleanup materials employed are photochemically reactive, all OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) and OC emissions from photochemically reactive cleanup materials employed are subject to an emission limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 2,100 lbs/month.
  - iv. Annual OC emissions cannot exceed 7.3 tons if photochemically reactive coatings and/or photochemically reactive cleanup materials are employed each and every day.
- 2.b** The permittee has requested federally enforceable limitations for emissions units K004 and P017-P028, of 93.86 tons VOC, 9.9 tons of any individual HAP, and 24.9 tons of combined HAPs, all based on content and gallon usage restrictions for the purpose of avoiding Title V applicability (see B.1, B.2 and B.3).

## **B. Operational Restrictions**

1. The permittee shall not employ any coating, as applied, in excess of 7.0 lbs VOC/gallon (process coatings) and 11.0 lbs VOC/gallon (machinist ink and/or special order process coatings).
2. The maximum annual coating usage for emissions units K004, P017-P028 combined shall not exceed any of the following:

- a. 3,050 gallons of coating with a maximum VOC content of 11.0 lbs/gallon of coating;
- b. 25,067 gallons of coating with a maximum VOC content of 7.0 lbs/gallon of coating;
- c. 25,067 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified in the table below:

**Maximum Allowable Cumulative Coating Usage (gallons)**

<u>Month(s)</u>	<u>&lt;11.0 lbs VOC/gal</u>	<u>&lt;7.0 lbs VOC/gal</u>	<u>Combined</u>
1-1	254	2,089	2,089
1-2	508	4,178	4,178
1-3	762	6,267	6,267
1-4	1,016	8,356	8,356
1-5	1,270	10,445	10,445
1-6	1,524	12,534	12,534
1-7	1,778	14,623	14,623
1-8	2,032	16,712	16,712
1-9	2,286	18,801	18,801
1-10	2,540	20,890	20,890
1-11	2,794	22,979	22,979
1-12	3,050	25,067	25,067

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

- 3. Combined annual HAP emissions from emissions units K004, P017-P028 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:

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**Maximum Allowable Cumulative HAP Emission Rates (tons)**

<b>Month(s)</b>	<b>Individual HAP</b>	<b>Combined HAPs</b>
1-1	0.825	2.075
1-2	1.650	4.150
1-3	2.475	6.225
1-4	3.300	8.300
1-5	4.125	10.375
1-6	4.950	12.450
1-7	5.775	14.525
1-8	6.600	16.600
1-9	7.425	18.675
1-10	8.250	20.750
1-11	9.075	22.825
1-12	9.900	24.900

After the first 12 calendar months of operation, compliance with the annual HAP emission limitations of 9.9 tons and 24.9 tons shall be based upon a rolling, 12-month summation of the monthly emission rates.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information for each day for emissions unit P027:
  - a. The company identification for each coating and cleanup material employed with an identification of whether each material is a photochemically reactive material.
  - b. The number of gallons of each coating and cleanup material employed.
  - c. The OC content of each coating and cleanup material, in pounds per gallon.
  - d. The total OC emission rate for all coatings and cleanup materials, i.e. (b) x (c) in pounds of OC per day calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii. above.
  - e. The total number of hours the emissions unit was in operation.
  - f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in

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pounds per hour (average) calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii. above.

2. The permittee shall collect and record the following information each month for emissions unit P027:
  - a. The company identification for each coating and cleanup material employed.
  - b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material.
  - c. The number of gallons of each coating and cleanup material employed.
  - d. The OC content of each coating and cleanup material, in lbs/gallon.
  - e. The OC emission rate for each coating and cleanup material, (c) x (d) in lbs/month.
  - f. The total OC emission rate for all coating and cleanup materials, sum of (e) in lbs/month.
  - g. The annual, year to date OC emission rate from all coating and cleanup material usage, sum of (f) for each calendar month to date from January to December.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for emissions units K004, P017-P028, as a group:
  - a. the company identification for each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material, in pounds per gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emission rate for each coating and cleanup material, (b) x (c) x 1 ton/2000 lbs., in tons per month;
  - e. the total VOC emission rate for all coatings and cleanup materials, i.e. the summation of (d), in tons per month;

- f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of VOC, in tons per month; and,
  - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of VOC, based on a rolling, 12-month summation.
4. In addition to the above information, the permittee shall also record the following information for each month for emissions units K004, P017-P028, as a group:
- a. for the first 12 months of operation under the provisions of this permit:
    - i. the cumulative gallon usage rate for each coating;
    - ii. the total number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the total number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating; and,
    - iv. the total number of gallons of all coatings.
  - b. after the first 12 months of operation under the provisions of this permit:
    - i. the annual\* number of gallons of each coating;
    - ii. the annual\* number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the annual\* number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating;
    - iv. the annual\* number of gallons of all coatings.

\*Based upon a rolling, 12-month summation of the coating emission rates.

Note: The coating information recorded above must be for the materials employed, including any thinning solvents added at the emissions unit.

5. The permittee shall collect and the following information regarding HAPs emissions each month for emissions units K004, P017-P028, as a group;

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- a. the name and identification of each coating and cleanup material employed;
- b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
- c. the number of gallons of each coating and cleanup material employed;
- d. the emission rate for each HAP from each coating and cleanup material employed, i.e. (b) x (c), for each HAP in lbs/month;
- e. the total emission rate for each HAP from all coatings and cleanup materials employed, i.e. the summation of (d) for each HAP, in lbs/month;
- f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, i.e. the summation of (e) for all HAPs in lbs/month;
- g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
- h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emissions unit P027, which include the following information:
  - a. An identification of each day during which the average hourly OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - b. An identification of each day during which the OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 40 pounds per day, and the actual OC emissions for each such day.

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- c. An identification of each day during which the average hourly OC emissions generated by the operating scenario outlined in A.2.a.i. exceeded 6.45 pounds per hour, and the actual average hourly OC emissions for each such day.
2. The permittee shall submit annual written reports for emissions unit P027, of any deviation (excursion) from the annual emissions limitation of 12.6 tons OC/year.

These reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

3. The permittee shall submit deviation (excursion) reports for emissions units K004, P017-P028, as a group, which identify exceedances of any of the following:
  - a. Any exceedances of the maximum allowable gallon usage rates and VOC content limitations specified in paragraphs B.1. and B.2.; and
  - b. Any exceedances of the maximum emissions limitations for each HAP and total combined HAPs specified in paragraph B.3.
4. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit, unless otherwise specified.

#### E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials.  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - b. Emission Limitation: 12.6 tons OC/yr from all coatings and cleanup materials.  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.2.
  - c. Emission Limitation: 8 lbs OC/hr, 40 lbs OC/day  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - d. Emission Limitation: Group limit of 93.86 tons VOC per rolling 12-month period based on coating usage and OC content restrictions

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Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.3.

- e. Emission Limitation: Group limit of 9.9 tons per rolling 12-month period of any individual HAP and 24.9 tons per rolling 12-month period of any combination of HAPs

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.5.

#### **F. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The terms and conditions of this PTI shall supersede the terms and conditions for this emissions unit established by PTI application number 03-9057 issued on November 15, 1995 and 03-13315 issued on November 17, 1999.

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Emissions Unit ID: P028

Issued: February 27, 2001

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P028 - Silk screen printing (19 HPB-A, formerly permitted as R009) modification (modified to establish synthetic minor requirements)	OAC rule 3745-31-05(A)(3)	6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials. (See A.2.a.i.)
	OAC rule 3745-21-07(G)(2)	12.6 tons OC/yr from all coatings and cleanup materials (See A.2.a.iv.)
	OAC rule 3745-35-07(B): Synthetic minor for the purpose of limiting emissions to levels below Title V applicability thresholds	8 lbs OC/hr, 40 lbs OC/day (See A.2.a.)
		Group Limit for K004 and P017-P028: 93.86 tons OC per rolling 12-month period based on coating usage and OC content restrictions (see A.2.b.)
		Group Limit for K004 and P017-P028: 9.9 tons per rolling 12-month period of any individual HAP* and 24.9 tons per rolling 12-month period of any combination of HAPs (see A.2.b.)

\* Hazardous Air Pollutant (HAP) as defined in Section 112(b) of the Clean Air Act.

**PPG Industries Inc - Crestline**  
**PTI**  
**Issue**

**Facility ID: 0370000217**

Emissions Unit ID: **P028**

**2. Additional Terms and Conditions**

**2.a** Emissions unit P028 will be subject to the following emissions limitations based on the type of coating and cleanup materials employed on a given day:

- i. On days when exclusively non-photochemically reactive coatings and non-photochemically reactive cleanup materials are employed, OC emissions from the coating and cleanup operations are subject to an emissions limitation of 6.45 lbs OC/hr.
  - ii. On days when any portion of the coatings employed are photochemically reactive and the cleanup material is non-photochemically reactive, OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) are subject to an emissions limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 2,100 lbs/month.
  - iii. On days when all or a portion of the cleanup materials employed are photochemically reactive, all OC emissions from the coating operation (both photochemically reactive and non-photochemically reactive) and OC emissions from photochemically reactive cleanup materials employed are subject to an emission limitation of 8 lbs/hr and 40 lbs/day. Note: OC emissions from the non-photochemically reactive cleanup materials are not counted towards compliance with these emissions limitations, but are subject to an emissions limitation of 2,100 lbs/month.
  - iv. Annual OC emissions cannot exceed 7.3 tons if photochemically reactive coatings and/or photochemically reactive cleanup materials are employed each and every day.
- 2.b** The permittee has requested federally enforceable limitations for emissions units K004 and P017-P028, of 93.86 tons VOC, 9.9 tons of any individual HAP, and 24.9 tons of combined HAPs, all based on content and gallon usage restrictions for the purpose of avoiding Title V applicability (see B.1, B.2 and B.3).

## **B. Operational Restrictions**

1. The permittee shall not employ any coating, as applied, in excess of 7.0 lbs VOC/gallon (process coatings) and 11.0 lbs VOC/gallon (machinist ink and/or special order process coatings).
2. The maximum annual coating usage for emissions units K004, P017-P028 combined shall not exceed any of the following:

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- a. 3,050 gallons of coating with a maximum VOC content of 11.0 lbs/gallon of coating;
- b. 25,067 gallons of coating with a maximum VOC content of 7.0 lbs/gallon of coating;
- c. 25,067 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative usage levels specified in the table below:

**Maximum Allowable Cumulative Coating Usage (gallons)**

<b><u>Month(s)</u></b>	<b><u>&lt;11.0 lbs VOC/gal</u></b>	<b><u>&lt;7.0 lbs VOC/gal</u></b>	<b><u>Combined</u></b>
1-1	254	2,089	2,089
1-2	508	4,178	4,178
1-3	762	6,267	6,267
1-4	1,016	8,356	8,356
1-5	1,270	10,445	10,445
1-6	1,524	12,534	12,534
1-7	1,778	14,623	14,623
1-8	2,032	16,712	16,712
1-9	2,286	18,801	18,801
1-10	2,540	20,890	20,890
1-11	2,794	22,979	22,979
1-12	3,050	25,067	25,067

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the monthly coating usage rates.

3. Combined annual HAP emissions from emissions units K004, P017-P028 shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for any combination HAPs, based upon a rolling, 12-month summation of the monthly HAP emissions.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the HAP emission rates specified in the following table:



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pounds per hour (average) calculated consistent with the limitations specified in paragraphs A.2.a.i. - A.2.a.iii. above.

2. The permittee shall collect and record the following information each month for emissions unit P028:
  - a. The company identification for each coating and cleanup material employed.
  - b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material.
  - c. The number of gallons of each coating and cleanup material employed.
  - d. The OC content of each coating and cleanup material, in lbs/gallon.
  - e. The OC emission rate for each coating and cleanup material, (c) x (d) in lbs/month.
  - f. The total OC emission rate for all coating and cleanup materials, sum of (e) in lbs/month.
  - g. The annual, year to date OC emission rate from all coating and cleanup material usage, sum of (f) for each calendar month to date from January to December.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for emissions units K004, P017-P028, as a group:
  - a. the company identification for each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material, in pounds per gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the VOC emission rate for each coating and cleanup material, (b) x (c) x 1 ton/2000 lbs., in tons per month;
  - e. the total VOC emission rate for all coatings and cleanup materials, i.e. the summation of (d), in tons per month;

- f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of VOC, in tons per month; and,
  - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of VOC, based on a rolling, 12-month summation.
4. In addition to the above information, the permittee shall also record the following information for each month for emissions units K004, P017-P028, as a group:
- a. for the first 12 months of operation under the provisions of this permit:
    - i. the cumulative gallon usage rate for each coating;
    - ii. the total number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the total number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating; and,
    - iv. the total number of gallons of all coatings.
  - b. after the first 12 months of operation under the provisions of this permit:
    - i. the annual\* number of gallons of each coating;
    - ii. the annual\* number of gallons of coatings with a maximum VOC content of 7.0 lbs/gallon of coating;
    - iii. the annual\* number of gallons of coatings with a maximum VOC content of 11.0 lbs/gallon of coating;
    - iv. the annual\* number of gallons of all coatings.

\*Based upon a rolling, 12-month summation of the coating emission rates.

Note: The coating information recorded above must be for the materials employed, including any thinning solvents added at the emissions unit.

5. The permittee shall collect and the following information regarding HAPs emissions each month

for emissions units K004, P017-P028, as a group;

- a. the name and identification of each coating and cleanup material employed;
- b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;
- c. the number of gallons of each coating and cleanup material employed;
- d. the emission rate for each HAP from each coating and cleanup material employed, i.e. (b) x (c), for each HAP in lbs/month;
- e. the total emission rate for each HAP from all coatings and cleanup materials employed, i.e. the summation of (d) for each HAP, in lbs/month;
- f. the total HAP emission rate for the combination of all HAPs from all coatings and cleanup materials employed, i.e. the summation of (e) for all HAPs in lbs/month;
- g. for the first 12 months of operation following the issuance of this permit, the cumulative monthly emission rate of each individual HAP and the combination of all HAPs, in tons per month; and
- h. after the first 12 months of operation under the provisions of this permit, the annual emissions of each individual HAP and the combination of all HAPs, based upon a rolling 12-month summation.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports for emissions unit P028, which include the following information:
  - a. An identification of each day during which the average hourly OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day.
  - b. An identification of each day during which the OC emissions generated by the operating scenarios outlined in A.2.a.ii. - A.2.a.iii. exceeded 40 pounds per day, and the actual OC emissions for each such day.

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- c. An identification of each day during which the average hourly OC emissions generated by the operating scenario outlined in A.2.a.i. exceeded 6.45 pounds per hour, and the actual average hourly OC emissions for each such day.
2. The permittee shall submit annual written reports for emissions unit P028, of any deviation (excursion) from the annual emissions limitation of 12.6 tons OC/year.

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These reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year. (These annual reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

3. The permittee shall submit deviation (excursion) reports for emissions units K004, P017-P028, as a group, which identify exceedances of any of the following:
  - a. Any exceedances of the maximum allowable gallon usage rates and VOC content limitations specified in paragraphs B.1. and B.2.; and
  - b. Any exceedances of the maximum emissions limitations for each HAP and total combined HAPs specified in paragraph B.3.
4. The permittee shall submit deviation (excursion) reports in accordance with the General Terms and Conditions of this permit, unless otherwise specified.

#### E. Testing Requirements

1. Compliance with the emission limitations in section A.1 of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitation: 6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials.  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - b. Emission Limitation: 12.6 tons OC/yr from all coatings and cleanup materials.  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.2.
  - c. Emission Limitation: 8 lbs OC/hr, 40 lbs OC/day  
Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.1.
  - d. Emission Limitation: Group limit of 93.86 tons VOC per rolling 12-month period based on coating usage and OC content restrictions

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.3.

- e. Emission Limitation: Group limit of 9.9 tons per rolling 12-month period of any individual HAP and 24.9 tons per rolling 12-month period of any combination of HAPs

Applicable Compliance Method: Compliance shall be based on the recordkeeping requirements as specified in C.5.

#### F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that the changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.
2. The terms and conditions of this PTI shall supersede the terms and conditions for this emissions unit established by PTI application number 03-13315 issued on November 17, 1999.

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13402 Facility ID: 0370000217

FACILITY NAME PPG Industries Inc - Crestline

FACILITY DESCRIPTION Products of purchased glass CITY/TWP Crestline

SIC CODE 3231 SCC CODE 3-05-999-99 EMISSIONS UNIT ID K004

EMISSIONS UNIT DESCRIPTION Miscellaneous metal parts coating operation (Mold shop lay out) (formerly permitted as R002)

DATE INSTALLED 1988

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment			30 lbs OC/day from coating and cleanup materials	5.5 tons OC/yr from coating and cleanup materials  Group limit: 93.86 tons VOCs per rolling 12-month period based on coating usage and VOC content restrictions
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					Group limit: 9.9TPY any individual HAP, 24.9 TPY combination of HAPs

APPLICABLE FEDERAL RULES:

NPSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES X NO

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13402 Facility ID: 0370000217

FACILITY NAME PPG Industries Inc - Crestline

FACILITY DESCRIPTION Products of purchased glass CITY/TWP Crestline

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028** \_\_\_\_\_

FACILITY DESCRIPTION Products of purchased glass CITY/TWP Crestline

SIC CODE 3231 SCC CODE 3-05-999-99 EMISSIONS UNIT ID P017

EMISSIONS UNIT DESCRIPTION Silk screen printing (North room 2) (formerly permitted as K001)

DATE INSTALLED 1974

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment			4.67 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials; other-wise 8 lbs/hr, 40 lbs/day from coating and cleanup materials	5.3 tons OC/yr from all coatings and cleanup materials  Group limit: 93.86 tons VOCs per rolling 12-month period based on coating usage and VOC content restrictions
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					Group limit: 9.9TPY any individual HAP, 24.9 TPY combination of HAPs

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Compliance with the terms and conditions of this permit.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028** \_\_\_\_\_

FACILITY DESCRIPTION Products of purchased glass CITY/TWP Crestline

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028**

FACILITY DESCRIPTION Products of purchased glass CITY/TWP Crestline

SIC CODE 3231 SCC CODE 3-05-999-99 EMISSIONS UNIT ID P018

EMISSIONS UNIT DESCRIPTION Silk screen printing (North room 3) (formerly permitted as K001)

DATE INSTALLED 1982

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment			4.67 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials; other-wise 8 lbs/hr, 40 lbs/day from coating and cleanup materials	5.3 tons OC/yr from all coatings and cleanup materials  Group limit: 93.86 tons VOCs per rolling 12-month period based on coating usage and VOC content restrictions
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					Group limit: 9.9TPY any individual HAP, 24.9 TPY combination of HAPs

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Compliance with the terms and conditions of this permit.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13402

Facility ID: 0370000217

FACILITY NAME PPG Industries Inc - Crestline

FACILITY DESCRIPTION Products of purchased glass

CITY/TWP Crestline

Emissions Unit ID: **P028**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES  X  NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028** \_\_\_\_\_

FACILITY DESCRIPTION Products of purchased glass CITY/TWP Crestline

SIC CODE 3231 SCC CODE 3-05-999-99 EMISSIONS UNIT ID P019

EMISSIONS UNIT DESCRIPTION Silk screen printing (1 DBO-A) (formerly permitted as K002)

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment			7.36 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials; other-wise 8 lbs/hr, 40 lbs/day from coating and cleanup materials.	14.3 tons OC/yr from all coatings and cleanup materials; 7.3 tons OC/yr if photochemically reactive coatings and/or cleanup materials are employed each and every day.  Group limit: 93.86 tons VOCs per rolling 12-month period based on coating usage and VOC content restrictions
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					Group limit: 9.9TPY any individual HAP, 24.9 TPY combination of HAPs

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028** \_\_\_\_\_

FACILITY DESCRIPTION Products of purchased glass

CITY/TWP Crestline

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Compliance with the terms and conditions of this permit.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13402 Facility ID: 0370000217

FACILITY NAME PPG Industries Inc - Crestline

FACILITY DESCRIPTION Products of purchased glass CITY/TWP Crestline

Emissions Unit ID: **P028**

SIC CODE 3231 SCC CODE 3-05-999-99 EMISSIONS UNIT ID P020

EMISSIONS UNIT DESCRIPTION Silk screen printing (1 DBO-B) (formerly permitted as K002)

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment			7.36 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials; other-wise 8 lbs/hr, 40 lbs/day from coating and cleanup materials.	14.3 tons OC/yr from all coatings and cleanup materials; 7.3 tons OC/yr if photochemically reactive coatings and/or cleanup materials are used each and every day.  Group limit: 93.86 tons VOCs per rolling 12-month period based on coating usage and VOC content restrictions
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					Group limit: 9.9TPY any individual HAP, 24.9 TPY combination of HAPs

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028** \_\_\_\_\_

FACILITY DESCRIPTION Products of purchased glass

CITY/TWP Crestline

**Compliance with the terms and conditions of this permit.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028**

FACILITY DESCRIPTION Products of purchased glass

CITY/TWP Crestline

SIC CODE 3231

SCC CODE 3-05-999-99

EMISSIONS UNIT ID P021

EMISSIONS UNIT DESCRIPTION Silk screen printing (5 DBO-A) (formerly permitted as K003)

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment			7.36 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials; other-wise 8 lbs/hr, 40 lbs/day from coating and cleanup materials	14.3 tons OC/yr from all coatings and cleanup materials; 7.3 tons OC/yr if photochemically reactive coatings and/or cleanup materials are used each and every day.  Group limit: 93.86 tons VOCs per rolling 12-month period based on coating usage and VOC content restrictions
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					Group limit: 9.9 TPY any individual HAP, 24.9 TPY combination of HAPs

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13402 Facility ID: 0370000217

FACILITY NAME PPG Industries Inc - Crestline

FACILITY DESCRIPTION Products of purchased glass CITY/TWP Crestline

Emissions Unit ID: **P028**

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**Compliance with the terms and conditions of this permit.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES  
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028**

FACILITY DESCRIPTION Products of purchased glass

CITY/TWP Crestline

SIC CODE 3231

SCC CODE 3-05-999-99

EMISSIONS UNIT ID P022

EMISSIONS UNIT DESCRIPTION Silk screen printing (5 DBO-B) (formerly permitted as K003)

DATE INSTALLED 1989

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment			7.36 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials; other-wise 8 lbs/hr, 40 lbs/day from coating and cleanup materials	14.3 tons OC/yr from all coatings and cleanup materials; 7.3 tons OC/yr if photochemically reactive coatings and/or cleanup materials are used each and every day.  Group limit: 93.86 tons VOCs per rolling 12-month period based on coating usage and VOC content restrictions
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					Group limit: 9.9 TPY any individual HAP, 24.9 TPY combination of HAPs

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028** \_\_\_\_\_

FACILITY DESCRIPTION Products of purchased glass

CITY/TWP Crestline

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Compliance with the terms and conditions of this permit.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_

YES

X

NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13402 Facility ID: 0370000217

FACILITY NAME PPG Industries Inc - Crestline

FACILITY DESCRIPTION Products of purchased glass CITY/TWP Crestline

Emissions Unit ID: **P028**

SIC CODE 3231 SCC CODE 3-05-999-99 EMISSIONS UNIT ID P023

EMISSIONS UNIT DESCRIPTION Silk screen printing (2 VAW) (formerly permitted as R004)

DATE INSTALLED 1993

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment			6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials; other-wise 8 lbs/hr, 40 lbs/day from coating and cleanup materials	8.8 tons OC/yr from all coatings and cleanup materials; 7.3 tons OC/yr if photochemically reactive coatings and/or cleanup materials are used each and every day.  Group limit: 93.86 tons VOCs per rolling 12-month period based on coating usage and VOC content restrictions
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					Group limit: 9.9 TPY any individual HAP, 24.9 TPY combination of HAPs

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028** \_\_\_\_\_

FACILITY DESCRIPTION Products of purchased glass

CITY/TWP Crestline

**Compliance with the terms and conditions of this permit.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028**

FACILITY DESCRIPTION Products of purchased glass CITY/TWP Crestline

SIC CODE 3231 SCC CODE 3-05-999-99 EMISSIONS UNIT ID P024

EMISSIONS UNIT DESCRIPTION Silk screen printing (21 HPB) (formerly permitted as R005)

DATE INSTALLED 1989

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment			6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials; other-wise 8 lbs/hr, 40 lbs/day from coating and cleanup materials	12.6 tons OC/yr from all coatings and cleanup materials; 7.3 tons OC/yr if photochemically reactive coatings and/or cleanup materials are used each and every day.  Group limit: 93.86 tons VOCs per rolling 12-month period based on coating usage and VOC content restrictions
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					Group limit: 9.9 TPY any individual HAP, 24.9 TPY combination of HAPs

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13402

Facility ID: 0370000217

FACILITY NAME PPG Industries Inc - Crestline

FACILITY DESCRIPTION Products of purchased glass

CITY/TWP Crestline

Emissions Unit ID: **P028**

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Compliance with the terms and conditions of this permit.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028**

FACILITY DESCRIPTION Products of purchased glass

CITY/TWP Crestline

SIC CODE 3231

SCC CODE 3-05-999-99

EMISSIONS UNIT ID P025

EMISSIONS UNIT DESCRIPTION Silk screen printing (20 HPB) (formerly permitted as R006)

DATE INSTALLED 1986

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment			6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials; other-wise 8 lbs/hr, 40 lbs/day from coating and cleanup materials	12.6 tons OC/yr from all coatings and cleanup materials; 7.3 tons OC/yr if photochemically reactive coatings and/or cleanup materials are used each and every day.  Group limit: 93.86 tons VOCs per rolling 12-month period based on coating usage and VOC content restrictions
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					Group limit: 9.9 TPY any individual HAP, 24.9 TPY combination of HAPs

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028** \_\_\_\_\_

FACILITY DESCRIPTION Products of purchased glass

CITY/TWP Crestline

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Compliance with the terms and conditions of this permit.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13402 Facility ID: 0370000217

FACILITY NAME PPG Industries Inc - Crestline

FACILITY DESCRIPTION Products of purchased glass CITY/TWP Crestline

Emissions Unit ID: **P028**

SIC CODE 3231 SCC CODE 3-05-999-99 EMISSIONS UNIT ID P026

EMISSIONS UNIT DESCRIPTION Silk screen printing (6 VAW) (formerly permitted as R007)

DATE INSTALLED 1987

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment			6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials; other-wise 8 lbs/hr, 40 lbs/day from coating and cleanup materials	8.8 tons OC/yr from all coatings and cleanup materials; 7.3 tons OC/yr if photochemically reactive coatings and/or cleanup materials are used each and every day.  Group limit: 93.86 tons VOCs per rolling 12-month period based on coating usage and VOC content restrictions
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					Group limit: 9.9 TPY any individual HAP, 24.9 TPY combination of HAPs

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028** \_\_\_\_\_

FACILITY DESCRIPTION Products of purchased glass

CITY/TWP Crestline

**Compliance with the terms and conditions of this permit.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028**

FACILITY DESCRIPTION Products of purchased glass

CITY/TWP Crestline

SIC CODE 3231

SCC CODE 3-05-999-99

EMISSIONS UNIT ID P027

EMISSIONS UNIT DESCRIPTION Silk screen printing (19 HPB-B) (formerly permitted as R008)

DATE INSTALLED 1985

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment			6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials; other-wise 8 lbs/hr, 40 lbs/day from coating and cleanup materials	12.6 tons OC/yr from all coatings and cleanup materials; 7.3 tons OC/yr if photochemically reactive coatings and/or cleanup materials are used each and every day.  Group limit: 93.86 tons VOCs per rolling 12-month period based on coating usage and VOC content restrictions
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					Group limit: 9.9 TPY any individual HAP, 24.9 TPY combination of HAPs

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

**NEW SOURCE REVIEW FORM B**

PTI Number: 03-13402

Facility ID: 0370000217

FACILITY NAME PPG Industries Inc - Crestline

FACILITY DESCRIPTION Products of purchased glass

CITY/TWP Crestline

Emissions Unit ID: **P028**

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**Compliance with the terms and conditions of this permit.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028**

FACILITY DESCRIPTION Products of purchased glass CITY/TWP Crestline

SIC CODE 3231 SCC CODE 3-05-999-99 EMISSIONS UNIT ID P028

EMISSIONS UNIT DESCRIPTION Silk screen printing (19 HPB-A) (formerly permitted as R009)

DATE INSTALLED 2000

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM <sub>10</sub>					
Sulfur Dioxide					
Organic Compounds	Attainment			6.45 lbs OC/hr on days when employing exclusively non-photochemically reactive coatings and cleanup materials; other-wise 8 lbs/hr, 40 lbs/day from coating and cleanup materials	12.6 tons OC/yr from all coatings and cleanup materials; 7.3 tons OC/yr if photochemically reactive coatings and/or cleanup materials are used each and every day.  Group limit: 93.86 tons VOCs per rolling 12-month period based on coating usage and VOC content restrictions
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					Group limit: 9.9 TPY any individual HAP, 24.9 TPY combination of HAPs

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

170 NEW SC

PTI Num

FACILITY

Emissions Unit ID: P028

FACILITY DESCRIPTION Products of purchased glass

CITY/TWP Crestline

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? YES

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

## NEW SOURCE REVIEW FORM B

PTI Number: 03-13402

Facility ID: 0370000217

FACILITY NAME PPG Industries Inc - Crestline

FACILITY DESCRIPTION Products of purchased glass

CITY/TWP Crestline

Emissions Unit ID: **P028**

**Please describe any hard copy information that is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):**

### Permit Review Forms

**Please provide any additional permit specific notes as you deem necessary:**

NONE

## Permit To Install Synthetic Minor Write-Up

### A. Source Description

PPG Industries, Inc.-Crestline has proposed a modification to emission limitations for thirteen coating operations located at their facility. Twelve of the emissions units are silk screening operations subject to OAC rules 3745-21-07(G)(2), (G)(4), (G)(5), (G)(8), and (G)(9), while the other emissions unit is a miscellaneous metal coating operation (mold shop layout operation) subject to OAC rule 3745-21-09(U)(2)(e)(iii). Group emission limitations for VOC, individual HAPs and any combination of HAPs will be established for these coating operations.

### B. Facility Emissions/Attainment Status

Actual emissions from the facility are currently less than 20 tons per year of VOC and, therefore, qualify for status as an "inherent minor source" pursuant to the Ohio EPA guideline that has been approved by US EPA (i.e. actual emissions less than 20% of the major source threshold). The facility is potentially a major source under Title V for VOC and HAPs emissions based on the aggregate allowable emissions from PTIs previously issued for emissions units at the facility. Richland County is currently designated attainment/unclassifiable for all criteria pollutants.

### C. New Source Emissions

POTENTIAL EMISSIONS: Without any restrictions, the facility has a potential to emit greater than 100 TPY VOC and greater than 10 TPY of any individual HAP and 25 TPY of any combination of HAPs.

RESTRICTING POTENTIAL EMISSIONS: The facility has requested a combined annual gallon coating usage restriction of 25,067 along with maximum VOC content restrictions of 7.0 lbs per gallon and 11.0 lbs per gallon, to reduce federally enforceable allowable VOC emissions below Title V levels. The facility has also requested annual emissions limitations of 9.9 TPY of any individual HAP and 24.9 TPY of any combination of HAPs to establish federally enforceable allowable emissions limitations below Title V applicability thresholds.

### D. Conclusions

With the coating gallon usage restrictions and VOC content restrictions, the VOC emissions will be below the Title V thresholds. With the annual HAP emissions limitations, the facility will be below the single and aggregate

**NEW SC**

PTI Num

FACILITY

Emissions Unit ID: **P028** \_\_\_\_\_

FACILITY DESCRIPTION Products of purchased glass CITY/TWP Crestline

HAP Title V thresholds. Therefore, the facility has established status as a synthetic minor and will not be subject to Title V.

**Please fill in the following for this permit:**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	93.86
OC*	141.3
Individual HAP	9.9
Aggregate HAPs	24.9

\*OC are inclusive of VOC