



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

**RE: FINAL PERMIT TO INSTALL  
FRANKLIN COUNTY  
Application No: 01-08601**

**CERTIFIED MAIL**

Y	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

**DATE:** 10/3/2002

Sherwin Williams Company  
Rick Holt  
2121 New World Dr  
Columbus, OH 43207

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 Directors 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,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA

CDO



**Permit To Install  
Terms and Conditions**

**Issue Date: 10/3/2002  
Effective Date: 10/3/2002**

**FINAL PERMIT TO INSTALL 01-08601**

Application Number: 01-08601

APS Premise Number: 0125041181

Permit Fee: **\$2600**

Name of Facility: Sherwin Williams Company

Person to Contact: Rick Holt

Address: 2121 New World Dr  
Columbus, OH 43207

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

**2121 New World Dr  
Columbus, Ohio**

Description of proposed emissions unit(s):

**Coil coatings paint production.**

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

Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit To Install General Terms and Conditions

#### 1. Monitoring and Related Record keeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or record keeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.10 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## **2. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

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

## **4. Title IV Provisions**

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

## **5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

## **6. General Requirements**

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

## **7. 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.

## **8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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

## 10. Permit To Operate Application

- 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

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.

**11. 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.

**12. 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.

**B. State Only Enforceable 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 Record keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping of state-only enforceable 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 state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping 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. 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.

**4. 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.

**5. 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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit or cannot meet applicable standards.

**6. 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.

**7. 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).

**8. 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.

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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.

**C. 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**

<b><u>Pollutant</u></b>	<b><u>Tons Per Year</u></b>
OC	15.4
PM	3.9

## Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

### B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

1. The permit to install for these emissions units in this permit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutants: 1-methoxy-2-propanol; cyclohexanone; methyl isobutyl ketone; methyl n-amyl ketone; toluene, methyl ethyl ketone

TLV (ug/m<sup>3</sup>): 368,000; 96,299; 204,826; 233,497; 188,405, 590,000

Maximum Hourly Emission Rate (lbs/hr): 7.2 - stack; 42.54 - fugitive

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 3,852; 633; 3,852; 3,852; 3,852, 3,852.

MAGLC (ug/m<sup>3</sup>): 8,776; 2,389; 4,877; 5,560; 4,486, 14,044

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the “Air Toxic Policy” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a “modification” under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the “Air Toxic Policy”:

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and
- c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the “Air Toxic Policy” for the change.

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
P170 - 1,000 gallon Hi-Low Mixer for solvent-based coating production vented to a dust collector and a thermal oxidizer 417A	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 4.9 lbs/batch and 5.4 tons/yr. See sections A.I.2.a and A.I.2.c below.
		Particulate emissions (PE) shall not exceed 0.22 lb/hr and 0.97 ton/yr. See section A.I.2.b and A.I.2.c below.
		Visible PE shall not exceed 5% opacity as a 3-minute average from any stack or outside vent associated with this emission unit, during the addition of solids.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-17-11(A)	The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.a and e below.

## **2. Additional Terms and Conditions**

- 2.a** The vapor collection system shall achieve a minimum 90% capture of OC, which shall be vented to the regenerative thermal oxidizer (RTO) that achieves a minimum 95% destruction efficiency.
- 2.b** The PE collection system shall achieve a minimum 70% capture efficiency and vent to the dust collector with that achieves a minimum 95% PE control.
- 2.c** The 0.22 lb PE/hr and 0.97 ton PE/yr emission limitations were established to reflect the potential to emit of this emissions unit. Therefore, record keeping and reporting requirements are not necessary to demonstrate compliance with the PE limitations.
- 2.d** The 4.9 lbs OC/batch and 5.4 tons OC/yr emission limitations were established to reflect the potential to emit of this emission unit. The batch emission limitation is based upon a "worst case coating" at a 4 hour batch period and a 1,000 gallon batch size at a maximum "worst case" emission rate of 8.84 lbs OC/1,800 gallon batch assuming formulation calculations in the applicant's air permit to install application. The annual emission limitation is based on 6 batches per day based on supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the 6 batch per day operational restriction or manufactures a coating that results in more emission than the "worse case" coating.
- 2.e** Upon final promulgation, the Maximum Achievable Control Technology (MACT) standard for Miscellaneous Coating Manufacturing provisions in 40Code of Federal Register (CFR) Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

## **II. Operational Restrictions**

- 1.** The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when these emissions units are in operation, shall not be less than 1,655 degrees Fahrenheit or 50 degrees less than the average combustion temperature during the most recent stack test that demonstrated compliance.
- 2.** The pressure drop across the dust collector shall be maintained within the range of 0.2 and 3 inches of water while the emissions unit is in operation.

3. The permittee shall not grind more than 6 batches of coatings per day.
4. The material addition hatch shall be closed, except during solids addition or product quality check.

### **III. Monitoring and/or Record keeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1,655 degrees Fahrenheit or 50 degrees less than the average combustion temperature during the most recent stack test that demonstrated compliance.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual. Once per day the permittee shall record the following in the operations log:
    - a. Pressure drop across the baghouse for each day of operation, and
    - b. A log or record of downtime for the control device and monitoring equipment, when the associated emissions unit is in operation.
  3. The permittee shall maintain monthly records of the following for solvent-based paint production:
    - a. The identification number of each formulation and batch production date;
    - b. The volume of each solvent, in gallons, added for each batch produced;
    - c. The number of paint batches ground per day; and
    - d. Summation of the number of paint batches ground per month.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify:
  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above;
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;
  - c. All periods of time during which the pressure drop across the dust collector did not comply with the allowable range specified above;
  - d. Each day during which more than 6 batches of solvent-based coatings were ground; and
  - e. Each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
OC emissions shall not exceed 4.9 lbs/batch.

Applicable Compliance Method:

Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities", assuming 90% capture and 98% destruction efficiency confirmed through testing. The calculations assume:  $E = P (X) V (MW) t (Sf)/RT$ ; where:  $P = 0.5416$  psia;  $MW = 96.83$  lb/mol;  $X = 1$  mole;  $R = 10.73$  psia ft<sup>3</sup>/lbmol R;  $850$  ft<sup>3</sup>/min;  $T = 565R$  (105 F);  $t = 30$  min;  $sf = 8\%$ ;  $(0.5416 \text{ psia}(1 \text{ mol}) 850 \text{ ft}^3/\text{min} (96.83 \text{ lb/mol}) 30 \text{ min} (0.08))/10.731 \text{ psia ft}^3/\text{lbmol R} (565 \text{ R}) = 17.65 \text{ lbs OC emitted} (1 - 0.98 \text{ control}) = 0.35 \text{ lb OC (stack) plus } (17.65/0.9) \times (1 - 0.9) = 1.96 \text{ lbs OC (fugitive)} = 2.3 \text{ lbs OC max (0.5 hr) emission..}$

- b. Emission Limitation:  
OC emissions shall not exceed 5.4 tons/yr

**Applicable Compliance Method:**

Compliance shall be assumed as long as the permittee does not exceed that daily batch emission restriction because the emission is based on the maximum potential to emit.

c. **Emission Limitation:**

PE shall not exceed 0.22 lb/hr.

**Applicable Compliance Method:**

Compliance shall be demonstrated through monitoring and record keeping found in section A.III.2.

d. **Emission Limitation:**

PE shall not exceed 0.97 ton/yr.

**Applicable Compliance Method:**

Compliance with the annual emission limitation shall be assumed as long as the emission unit complies with the hourly limit.

e. **Emission Limitation:**

Visible PE shall not exceed 5% opacity, as a 3-minute average, from any stack or outside vent associated with this emission unit, during the addition of solids.

**Applicable Compliance Method:**

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

**VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. 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>
P170 - 1,000 gallon Hi-Low Mixer for solvent-based coating production vented to a baghouse and a thermal oxidizer 417A	None	None

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
P171 - 1,000 gallon Hi-Low mixer for solvent-based coating production vented to a baghouse and thermal oxidizer 417B	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 4.9 lbs/batch and 5.4 tons/yr. See sections A.I.2.a and A.I.2.c below.
	OAC rule 3745-21-07(G)(2)	Particulate emissions (PE) shall not exceed 0.22 lb/hr and 0.97 ton/yr. See sections A.I.2.b and A.I.2.c below.
	OAC rule 3745-17-07(A)(1)	Visible PE shall not exceed 5% opacity as a 3-minute average from any stack or outside vent associated with this emission unit, during the addition of solids.
	OAC rule 3745-17-11(A)	The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-17-11(A)	The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-17-11(A)	The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.a and e below.

## 2. Additional Terms and Conditions

- 2.a** The vapor collection system shall achieve a minimum 90% capture of OC, which shall be vented to the regenerative thermal oxidizer (RTO) that achieves a minimum 95% destruction efficiency.
- 2.b** The PE collection system shall achieve a minimum 70% capture efficiency and vent to the dust collector with that achieves a minimum 95% PE control.
- 2.c** The 0.22 lb PE/hr and 0.97 ton PE/yr emission limitations were established to reflect the potential to emit of this emissions unit. Therefore, record keeping and reporting requirements are not necessary to demonstrate compliance with the PE limitations.
- 2.d** The 4.9 lbs OC/batch and 5.4 tons OC/yr emission limitations were established to reflect the potential to emit of this emission unit. The batch emission limitation is based upon a "worst case coating" at a 4 hour batch period and a 800 gallon batch size at a maximum "worst case" emission rate of 8.84 lbs OC/1,800 gallon batch assuming formulation calculations in the applicant's air permit to install application. The annual emission limitation is based on 6 batches per day based on supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the 6 batch per day operational restriction or manufactures a coating that results in more emission than the "worse case" coating.
- 2.e** Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing provisions in 40CFR Part 63, Subpart HHHHH (MACT, HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

## II. Operational Restrictions

- 1.** The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when these emissions units are in operation, shall not be less than 1,655 degrees Fahrenheit or 50 degrees less than the average combustion temperature during the most recent stack test that demonstrated compliance.
- 2.** The pressure drop across the dust collector shall be maintained within the range of 0.2 and 3 inches of water while the emissions unit is in operation.

3. The permittee shall not grind more than 6 batches of coatings per day.
4. The material addition hatch shall be closed, except during solids addition or product quality check.

### **III. Monitoring and/or Record keeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1,655 degrees Fahrenheit or 50 degrees less than the average combustion temperature during the most recent stack test that demonstrated compliance.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the dust collector while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual. Once per day the permittee shall record the following in the operations log:
    - a. Pressure drop across the dust collector for each day of operation, and
    - b. A log or record of downtime for the control device and monitoring equipment, when the associated emissions unit is in operation.
  3. The permittee shall maintain monthly records of the following for solvent-based paint production:
    - a. The identification number of each formulation and batch production date;
    - b. The volume of each solvent, in gallons, added for each batch produced;
    - c. The number of paint batches ground per day; and
    - d. Summation of the number of paint batches ground per month.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify:
  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above;
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;
  - c. All periods of time during which the pressure drop across the dust collector did not comply with the allowable range specified above;
  - d. Each day during which more than 6 batches of solvent-based coatings were ground; and
  - e. Each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
OC emissions shall not exceed 4.9 lbs/batch.

Applicable Compliance Method:

Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities", assuming 90% capture and 98% destruction efficiency confirmed through testing. The calculations assume:  $E = P (X) V (MW) t (Sf)/RT$ ; where:  $P = 0.5416$  psia;  $MW = 96.83$  lb/mol;  $X = 1$  mole;  $R = 10.73$  psia ft<sup>3</sup>/lbmol R;  $850$  ft<sup>3</sup>/min;  $T = 565R$  (105 F);  $t = 30$  min;  $sf = 8\%$ ;  $(0.5416 \text{ psia}(1 \text{ mol}) 850 \text{ ft}^3/\text{min} (96.83 \text{ lb/mol}) 30 \text{ min} (0.08))/10.731 \text{ psia ft}^3/\text{lbmol R} (565 \text{ R}) = 17.65 \text{ lbs OC emitted} (1 - 0.98 \text{ control}) = 0.35 \text{ lb OC (stack) plus } (17.65/0.9) \times (1 - 0.9) = 1.96 \text{ lbs OC (fugitive)} = 2.3 \text{ lbs OC max (0.5 hr) emission.}$

- b. Emission Limitation:

OC emissions shall not exceed 5.4 tons/yr.

Applicable Compliance Method:

Compliance shall be assumed as long as the permittee does not exceed that daily batch emission restriction because the emission is based on the maximum potential to emit.

- c. Emissions Limitation:  
PE shall not exceed 0.22 lb/hr.

Applicable Compliance Method:

Compliance shall be demonstrated through monitoring and record keeping found in section A.III.2.

- d. Emissions Limitation:  
PE shall not exceed 0.97 ton per year.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as the emission unit complies with the hourly limit.

- e. Emissions Limitation:  
Visible PE shall not exceed 5% opacity as a 3-minute average from any stack or outside vent associated with this emission unit, during the addition of solids.

Applicable Compliance Method:

If required compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

## **VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. 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>
P171 - 1,000 gallon Hi-Low mixer for solvent-based coating production vented to a baghouse and thermal oxidizer 417B	None	None

2. **Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
P172 - 750 gallon high speed disperser (HSD) for solvent-based coating production vented to a baghouse and a thermal oxidizer 418	OAC rule 3745-31-05(A)(3)	Organic Compounds (OC) emissions shall not exceed 3.68 lbs/batch and 4.0 tons/yr. See sections A.I.2.a and A.I.2.c below.  Particulate emissions (PE) shall not exceed 0.22 lb/hr and 0.97 ton/yr. See sections A.I.2.b and A.I.2.c below.  Visible PE shall not exceed 5% opacity as a 3-minute average from any stack or outside vent associated with this emission unit, during the addition of solids.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-17-11(A)	The emission limitation specified by this rule is less stringent than limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.a and e below.

## **2. Additional Terms and Conditions**

- 2.a** The vapor collection system shall achieve a minimum 90% capture of OC, which shall be vented to the regenerative thermal oxidizer (RTO) that achieves a minimum 95% destruction efficiency.
- 2.b** The PE collection system shall achieve a minimum 70% capture efficiency and vent to the dust collector with that achieves a minimum 95% PE control.
- 2.c** The 0.22 lb PE/hr and 0.97 ton PE/yr emission limitations were established to reflect the potential to emit of this emissions unit. Therefore, record keeping and reporting requirements are not necessary to demonstrate compliance with the PE limitations.
- 2.d** The 3.68 lbs OC/batch and 4.0 tons OC/yr emission limitations were established to reflect the potential to emit of this emission unit. The batch emission limitation is based upon a "worst case coating" at a 4 hour batch period and a 800 gallon batch size at a maximum "worst case" emission rate of 8.84 lbs OC/1,800 gallons batch assuming formulation calculations in the applicant's air permit to install application. The annual emission limitation is based on 6 batches per day based on supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the 6 batch per day operational restriction or manufactures a coating that results in more emission than the "worse case" coating.
- 2.e** Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

## **II. Operational Restrictions**

- 1.** The average combustion temperature within the thermal oxidizer, for any 3-hour block of time when these emissions units are in operation, shall not be less than 1,655 degrees Fahrenheit or 50 degrees less than the average combustion temperature during the most recent stack test that demonstrated compliance.
- 2.** The pressure drop across the dust collector shall be maintained within the range of 0.2 and 3 inches of water while the emissions unit is in operation.

3. The permittee shall not grind more than 6 batches of coatings per day.
4. The material addition hatch shall be closed, except during solids addition or product quality check.

### **III. Monitoring and/or Record keeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1,655 degrees Fahrenheit.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the dust collector while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual. Once per day the permittee shall record the following in the operations log:
    - a. Pressure drop across the dust collector for each day of operation, and
    - b. A log or record of downtime for the control device and monitoring equipment, when the associated emissions unit is in operation.
3. The permittee shall maintain monthly records of the following for solvent-based paint production:
    - a. The identification number of each formulation and batch production date;
    - b. The volume of each solvent, in gallons, added for each batch produced;
    - c. The number of paint batches ground per day; and
    - d. Summation of the number of paint batches ground per month.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify:
  - a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above;
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;
  - c. All periods of time during which the pressure drop across the dust collector did not comply with the allowable range specified above;
  - d. Each day during which more than 6 batches of solvent-based coatings were ground; and
  - e. Each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
OC emissions shall not exceed 3.68 lbs/batch.

Applicable Compliance Method:

Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" assuming 100% capture and 95% control efficiency. The calculations assume:  $E = P (X) V (MW) t (Sf) / RT$ ; where:  $P = 0.5416$  psia;  $MW = 96.83$  lb/mol;  $X = 1$  mole;  $R = 10.73$  psia ft<sup>3</sup>/lbmol R;  $850$  ft<sup>3</sup>/min;  $T = 565R$  (105 F);  $t = 30$  min;  $sf = 8\%$ ;  $(0.5416 \text{ psia}(1 \text{ mol}) 850 \text{ ft}^3/\text{min} (96.83 \text{ lb}/\text{mol}) 30 \text{ min} (0.08)) / 10.731 \text{ psia ft}^3/\text{lbmol R} (565 \text{ R}) = 17.65$  lbs OC emitted  $(1 - 0.98 \text{ control}) = 0.35$  lb OC (stack) plus  $(17.65/0.9) \times (1 - 0.9) = 1.96$  lbs OC (fugitive) = 2.3 lbs OC max (0.5 hr) emission.

- b. Emission Limitation:

OC emissions shall not exceed 4.0 tons/yr.

Applicable Compliance Method:

Compliance shall be assumed as long as the permittee does not exceed that daily batch emission restriction because the emission is based on the maximum potential to emit.

c. Emission Limitation:

PE shall not exceed 0.22 lb/hr.

Applicable Compliance Method:

Compliance shall be demonstrated through monitoring and record keeping found in section A.III.2.

d. Emission Limitation:

PE shall not exceed 0.97 ton per year.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be assumed as long as the emission unit complies with the hourly limit.

e. Emission Limitation:

Visible PE shall not exceed 5% opacity as a 3-minute average from any stack or outside vent associated with this emission unit, during the addition of solids.

Applicable Compliance Method:

If required compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

## **VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. 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>
P172 - 750 gallon high speed disperser (HSD) for solvent-based coating production vented to a baghouse and a thermal oxidizer 418	None	None

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
P173 - 1,000 gallon thin and shade tank for solvent-based coating production vented to zeolite cannister (501)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.34 lb/batch and 0.03 ton/yr. See section A.I.2.a, below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

**2. Additional Terms and Conditions**

- 2.a The 0.34 lb OC/batch and 0.03 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and is based upon the following parameters: a 48 hour batch period at a maximum 0.34 lb OC/1,000 gallon batch assuming "worst case" emission formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.
- 2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to

process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

## **II. Operational Restrictions**

1. All OC emissions generated during pump-in and solvent blending in emissions units shall be vented to a control device that achieves a minimum 95% removal of OC emissions.
2. The permittee shall not blend and pump to a fill line more than 15 batches of coating per month from this emission unit.

## **III. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records for each batch of paint produced in the thin and shade tanks:
  - a. The identification of the formulation, date and volume of grind pumped into the tank;
  - b. The volume of each solvent added during each batch, in either pounds or gallons;
  - c. A calculation of the liquid organic material content in percent by weight solvent in the final product with a determination of the photochemical reactivity of the coating; and
  - d. The cumulative number of batches of coatings blended and pumped to the fill line from this emission unit.
2. The permittee shall monitor for OC concentrations at a minimum of one time per month in accordance with the Procedure for Organic Vapor Monitoring (OVM) attached to the letter submitted to Ohio EPA, CDO on December 13, 2000. The permittee shall maintain a monthly record on the OVM Log.

The permittee shall maintain a record of all OVM Logs on file, which shall be made available to representatives of the Ohio EPA, upon request.

## **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following occurrences:
  - a. Each month during which 15 batches of coating were blended and pumped to a fill line from this emission unit;
  - b. Each month during which OVM was not performed;
  - c. Each instance when a corrective action, that was to be performed as a result of an OVM, was not implemented; and

- d. Each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

- 2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

## **V. Testing Requirements**

- 1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
OC emissions shall not exceed 0.34 lb/batch.

**Applicable Compliance Method:**

Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" assuming 100% capture and 95% control efficiency.  $E = \frac{P(X)V(MW)}{RT}$ : Where P = 0.9364 psia; MW = 96.66 lb/mol; X = 1 mole; R = 10.731 psia ft<sup>3</sup>/lbmol R; V = 241 ft<sup>3</sup>; T = 585 R (125 F);  $E = \frac{0.9364 \text{ psia} (1 \text{ mole}) 241 \text{ ff}^3 (96.66 \text{ lb/mol})}{10.731 \text{ psia ft}^3/\text{lbmol R} (585 \text{ R})} = 3.47 \text{ lbs} * (1 - 0.95) = 0.17 \text{ lb OC}$ .

- b. Emission Limitation:  
OC emissions shall not exceed 0.03 ton/yr.

**Applicable Compliance Method:**

Compliance shall be assumed as long as the permittee does not exceed that daily batch emission restriction because the emission is based on the maximum potential to emit.

## **VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. 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>
P173 - 1,000 gallon thin and shade tank for solvent-based coating production vented to zeolite cannister 501	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
P174 - 1,000 gallon thin and shade tank for solvent-based coating production vented to a zeolite cannister 502	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.34 lb/batch and 0.03 ton/yr. See section A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

**2. Additional Terms and Conditions**

- 2.a The 0.34 lb OC/batch and 0.03 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and is based upon the following parameters: a 48 hour batch period at a maximum 0.34 lb OC/1,000 gallon batch assuming "worst case" coating formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.
- 2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to

process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

## **II. Operational Restrictions**

1. All OC emissions generated during pump-in and solvent blending in emissions units shall vented to a control device that achieves a minimum 95% removal of OC emissions.
2. The permittee shall not blend and pump to a fill line more than 15 batches of coating per month from this emission unit.

## **III. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records for each batch of paint produced in the thin and shade tanks:
  - a. The identification of the formulation, date and volume of grind pumped into the tank;
  - b. The volume of each solvent added during each batch, in either pounds or gallons;
  - c. A calculation of the liquid organic material content in percent by weight solvent in the final product with a determination of the photochemical reactivity of the coating; and
  - d. The cumulative number of batches of coatings blended and pumped to the fill line from this emission unit.
2. The permittee shall monitor for OC concentrations at a minimum of one time per month in accordance with the Procedure for Organic Vapor Monitoring (OVM) attached to the letter submitted to Ohio EPA, CDO on December 13, 2000. The permittee shall maintain a monthly record on the OVM Log.

The permittee shall maintain a record of all OVM Logs on file, which shall be made available to representatives of the Ohio EPA, upon request.

## **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following occurrences:
  - a. Each month during which 15 batches of coating were blended and pumped to a fill line from this emission unit;
  - b. Each month during which OVM was not performed;
  - c. Each instance when a corrective action, that was to be performed as a result of an OVM, was not implemented; and

- d. Each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

## **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
OC emissions shall not exceed 0.34 lb/batch.

**Applicable Compliance Method:**

Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" assuming 100% capture and 95% control efficiency.  $E = \frac{P(X)V(MW)}{RT}$ : Where P = 0.9364 psia; MW = 96.66 lb/mol; X = 1 mole; R = 10.731 psia ft<sup>3</sup>/lbmol R; V = 241 ft<sup>3</sup>; T = 585 R (125 F);  $E = \frac{0.9364 \text{ psia} (1 \text{ mole}) 241 \text{ ff}^3 (96.66 \text{ lb/mol})}{10.731 \text{ psia ft}^3/\text{lbmol R} (585 \text{ R})} = 3.47 \text{ lbs} * (1 - 0.95) = 0.17 \text{ lb OC}$ .

- b. Emission Limitation:  
OC emissions shall not exceed 0.03 ton per year.

**Applicable Compliance Method:**

Compliance shall be assumed as long as the permittee does not exceed that daily batch emission restriction because the emission is based on the maximum potential to emit.

## **VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. 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>
P174 - 1,000 gallon thin and shade tank for solvent-based coating production vented to a zeolite cannister 502	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
P175 - 2,000 gallon thin and shade tank for solvent-based coating production vented to a zeolite cannister 503	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.67 lb/batch and 0.06 ton per year. See section A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

**2. Additional Terms and Conditions**

- 2.a The 0.67 lb OC/batch and 0.06 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and is based upon the following parameters: a 48 hour batch period at a maximum 0.34 lb OC/1,000 gallon batch assuming "worst case" emission formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.
- 2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to

process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

## **II. Operational Restrictions**

1. All OC emissions generated during pump-in and solvent blending in emissions units shall vented to a control device that achieves a minimum 95% removal of OC emissions.
2. The permittee shall not blend and pump to a fill line more than 15 batches of coating per month from this emission unit.

## **III. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records for each batch of paint produced in the thin and shade tanks:
  - a. The identification of the formulation, date and volume of grind pumped into the tank;
  - b. The volume of each solvent added during each batch, in either pounds or gallons;
  - c. A calculation of the liquid organic material content in percent by weight solvent in the final product with a determination of the photochemical reactivity of the coating; and
  - d. The cumulative number of batches of coatings blended and pumped to the fill line from this emission unit.
2. The permittee shall monitor for OC concentrations at a minimum of one time per month in accordance with the Procedure for Organic Vapor Monitoring (OVM) attached to the letter submitted to Ohio EPA, CDO on December 13, 2000. The permittee shall maintain a monthly record on the OVM Log.

The permittee shall maintain a record of all OVM Logs on file, which shall be made available to representatives of the Ohio EPA, upon request.

## **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following occurrences:
  - a. Each month during which 15 batches of coating were blended and pumped to a fill line from this emission unit;
  - b. Each month during which OVM was not performed;
  - c. Each instance when a corrective action, that was to be performed as a result of an OVM, was not implemented; and

- d. Each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

- 2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

## **V. Testing Requirements**

- 1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
OC emissions shall not exceed 0.67 lb/batch.

**Applicable Compliance Method:**

Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" assuming 100% capture and 95% control efficiency.  $E = \frac{P(X)V(MW)}{RT}$ : Where P = 0.9364 psia; MW = 96.66 lb/mol; X = 1 mole; R = 10.731 psia ft<sup>3</sup>/lbmol R; V = 241 ft<sup>3</sup>; T = 585 R (125 F);  $E = \frac{0.9364 \text{ psia} (1 \text{ mole}) 241 \text{ ft}^3 (96.66 \text{ lb/mol})}{10.731 \text{ psia ft}^3/\text{lbmol R} (585 \text{ R})} = 3.47 \text{ lbs} * (1 - 0.95) = 0.17 \text{ lb OC}$ .

- b. Emission Limitation:  
OC emissions shall not exceed 0.06 ton per year.

**Applicable Compliance Method:**

Compliance shall be assumed as long as the permittee does not exceed that daily batch emission restriction because the emission is based on the maximum potential to emit.

## **VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. 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>
P175 - 2,000 gallon thin and shade tank for solvent-based coating production vented to a zeolite cannister 503	None	None

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
P176 - 2,000 gallon thin and shade tank for solvent-based coating production vented to a zeolite cannister 504	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 0.67 lb/batch and 0.06 ton/yr. See section A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

**2. Additional Terms and Conditions**

- 2.a The 0.67 lb OC/batch and 0.06 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and is based upon the following parameters: a 48 hour batch period at a maximum 0.34 lb OC/1,000 gallon batch assuming "worst case" coating formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.
- 2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to

process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

## **II. Operational Restrictions**

1. All OC emissions generated during pump-in and solvent blending in emissions units shall vented to a control device that achieves a minimum 95% removal of OC emissions.
2. The permittee shall not blend and pump to a fill line more than 15 batches of coating per month from this emission unit.

## **III. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records for each batch of paint produced in the thin and shade tanks:
  - a. The identification of the formulation, date and volume of grind pumped into the tank;
  - b. The volume of each solvent added during each batch, in either pounds or gallons;
  - c. A calculation of the liquid organic material content in percent by weight solvent in the final product with a determination of the photochemical reactivity of the coating; and
  - d. The cumulative number of batches of coatings blended and pumped to the fill line from this emission unit.
2. The permittee shall monitor for OC concentrations at a minimum of one time per month in accordance with the Procedure for Organic Vapor Monitoring (OVM) attached to the letter submitted to Ohio EPA, CDO on December 13, 2000. The permittee shall maintain a monthly record on the OVM Log.

The permittee shall maintain a record of all OVM Logs on file, which shall be made available to representatives of the Ohio EPA, upon request.

## **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following occurrences:
  - a. Each month during which 15 batches of coating were blended and pumped to a fill line from this emission unit;
  - b. Each month during which OVM was not performed;
  - c. Each instance when a corrective action, that was to be performed as a result of an OVM, was not implemented; and

- d. Each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

- 2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

## **V. Testing Requirements**

- 1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
OC emissions shall not exceed 0.67 lb/batch.

**Applicable Compliance Method:**

Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" assuming 100% capture and 95% control efficiency.  $E = \frac{P(X)V(MW)}{RT}$ : Where P = 0.9364 psia; MW = 96.66 lb/mol; X = 1 mole; R = 10.731 psia ft<sup>3</sup>/lbmol R; V = 241 ft<sup>3</sup>; T = 585 R (125 F);  $E = \frac{0.9364 \text{ psia} (1 \text{ mole}) 241 \text{ ff}^3 (96.66 \text{ lb/mol})}{10.731 \text{ psia ft}^3/\text{lbmol R} (585 \text{ R})} = 3.47 \text{ lbs} * (1 - 0.95) = 0.17 \text{ lb OC}$ .

- b. Emission Limitation:  
OC emissions shall not exceed 0.06 ton per year.

**Applicable Compliance Method:**

Compliance shall be assumed as long as the permittee does not exceed that daily batch emission restriction because the emission is based on the maximum potential to emit.

## **VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. 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>
P176 - 2,000 gallon thin and shade tank for solvent-based coating production vented to a zeolite cannister 504	None	None

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
P177 - 4,000 gallon thin and shade tank for solvent-based coating production vented to zeolite cannister 505	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.35 lbs/batch and 0.12 ton per year. See section A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

**2. Additional Terms and Conditions**

- 2.a The 1.35 lbs OC/batch and 0.12 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and is based upon the following parameters: a 48 hour batch period at a maximum 0.34 lb OC/1,000 gallon batch assuming "worst case" coating formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.
- 2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to

process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

## **II. Operational Restrictions**

1. All OC emissions generated during pump-in and solvent blending in emissions units shall vented to a control device that achieves a minimum 95% removal of OC emissions.
2. The permittee shall not blend and pump to a fill line more than 15 batches of coating per month from this emission unit.

## **III. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records for each batch of paint produced in the thin and shade tanks:
  - a. The identification of the formulation, date and volume of grind pumped into the tank;
  - b. The volume of each solvent added during each batch, in either pounds or gallons;
  - c. A calculation of the liquid organic material content in percent by weight solvent in the final product with a determination of the photochemical reactivity of the coating; and
  - d. The cumulative number of batches of coatings blended and pumped to the fill line from this emission unit.
2. The permittee shall monitor for OC concentrations at a minimum of one time per month in accordance with the Procedure for Organic Vapor Monitoring (OVM) attached to the letter submitted to Ohio EPA, CDO on December 13, 2000. The permittee shall maintain a monthly record on the OVM Log.

The permittee shall maintain a record of all OVM Logs on file, which shall be made available to representatives of the Ohio EPA, upon request.

## **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following occurrences:
  - a. Each month during which 15 batches of coating were blended and pumped to a fill line from this emission unit;
  - b. each month during which OVM was not performed;
  - c. Each instance when a corrective action, that was to be performed as a result of an OVM, was not implemented; and

- d. Each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

- 2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

## **V. Testing Requirements**

- 1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
OC emissions shall not exceed 1.35 lbs/batch.

**Applicable Compliance Method:**

Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" assuming 100% capture and 95% control efficiency.  $E = \frac{P(X)V(MW)}{RT}$ : Where P = 0.9364 psia; MW = 96.66 lb/mol; X = 1 mole; R = 10.731 psia ft<sup>3</sup>/lbmol R; V = 241 ft<sup>3</sup>; T = 585 R (125 F);  $E = \frac{0.9364 \text{ psia} (1 \text{ mole}) 241 \text{ ft}^3 (96.66 \text{ lb/mol})}{10.731 \text{ psia ft}^3/\text{lbmol R} (585 \text{ R})} = 3.47 \text{ lbs} * (1 - 0.95) = 0.17 \text{ lb OC}$ .

- b. Emission Limitation:  
OC emissions shall not exceed 0.12 ton per year.

**Applicable Compliance Method:**

Compliance shall be assumed as long as the permittee does not exceed that monthly batch emission restriction because the emission is based on the maximum potential to emit.

## **VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. 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>
P177 - 4,000 gallon thin and shade tank for solvent-based coating production vented to zeolite cannister 505	None	None

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
P178 - 4,000 gallon thin and shade tank for solvent-based coating production vented to zeolite cannister 506	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.35 lbs/batch and 0.12 ton/yr. See section A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

**2. Additional Terms and Conditions**

- 2.a The 1.35 lbs OC/batch and 0.12 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and is based upon the following parameters: a 48 hour batch period at a maximum 0.34 lb OC/1,000 gallon batch assuming "worst case" coating formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.
- 2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to

process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

## **II. Operational Restrictions**

1. All OC emissions generated during pump-in and solvent blending in emissions units shall vented to a control device that achieves a minimum 95% removal of OC emissions.
2. The permittee shall not blend and pump to a fill line more than 15 batches of coating per month from this emission unit.

## **III. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records for each batch of paint produced in the thin and shade tanks:
  - a. The identification of the formulation, date and volume of grind pumped into the tank;
  - b. The volume of each solvent added during each batch, in either pounds or gallons;
  - c. A calculation of the liquid organic material content in percent by weight solvent in the final product with a determination of the photochemical reactivity of the coating; and
  - d. The cumulative number of batches of coatings blended and pumped to the fill line from this emission unit.
2. The permittee shall monitor for OC concentrations at a minimum of one time per month in accordance with the Procedure for Organic Vapor Monitoring (OVM) attached to the letter submitted to Ohio EPA, CDO on December 13, 2000. The permittee shall maintain a monthly record on the OVM Log

The permittee shall maintain a record of all OVM Logs on file, which shall be made available to representatives of the Ohio EPA, upon request.

## **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following occurrences:
  - a. Each month during which 15 batches of coating were blended and pumped to a fill line from this emission unit;
  - b. Each month during which OVM was not performed;
  - c. Each instance when a corrective action, that was to be performed as a result of an OVM, was not implemented; and

- d. Each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

- 2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

## **V. Testing Requirements**

- 1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
OC emissions shall not exceed 1.35 lbs/batch.

Applicable Compliance Method:

Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" assuming 100% capture and 95% control efficiency.  $E = \frac{P(X)V(MW)}{RT}$ : Where  $P = 0.9364$  psia;  $MW = 96.66$  lb/mol;  $X = 1$  mole;  $R = 10.731$  psia ft<sup>3</sup>/lbmol R;  $V = 241$  ft<sup>3</sup>;  $T = 585$  R (125 F);  $E = \frac{0.9364 \text{ psia} (1 \text{ mole}) 241 \text{ ft}^3 (96.66 \text{ lb/mol})}{10.731 \text{ psia ft}^3/\text{lbmol R} (585 \text{ R})} = 3.47 \text{ lbs} * (1 - 0.95) = 0.17 \text{ lb OC}$ .

- b. Emission Limitation:  
OC emissions shall not exceed 0.12 ton/yr.

Applicable Compliance Method:

Compliance shall be assumed as long as the permittee does not exceed that monthly batch emission restriction because the emission is based on the maximum potential to emit.

## **VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. 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>
P178 - 4,000 gallon thin and shade tank for solvent-based coating production vented to zeolite cannister 506	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. 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>
P179 - 5,000 gallon thin and shade tank for solvent-based coating production vented to zeolite cannister 355	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 1.68 lbs/batch and 0.15 ton/yr. See section A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is equivalent or less stringent than the limit established pursuant OAC rule 3745-31-05.
	OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act	See I.A.2.b below.

**2. Additional Terms and Conditions**

- 2.a The 1.68 lbs OC/batch and 0.15 ton OC/yr emission limitations were established to reflect the potential to emit of this emission unit and is based upon the following parameters: a 48 hour batch period at a maximum 0.34 lb OC/1,000 gallon batch assuming "worst case" coating formulation calculations in the applicant's air permit to install application and supplemental information provided by the applicant. Therefore, compliance with the hourly and annual emission limitation is assumed as long as the permittee does not exceed the operational restriction or manufactures a coating that results in more emission than the "worse case" coating.
- 2.b Upon final promulgation, the MACT standard for Miscellaneous Coating Manufacturing provisions in 40CFR Part 63, Subpart HHHHH (MACT HHHHH) will apply to this facility. OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act apply to this project because MACT, HHHHH has not yet been promulgated final and the increase in uncontrolled potential to emit from this project is greater then 10 tons per year for an individual hazardous air pollutant (HAP) and/or 25 tons per year for total combined HAPs. To meet the requirements of OAC rule 3745-31-28 and Section 112(g) of the Clean Air Act, the permittee has committed to meet the draft requirements of MACT, HHHHH through this permit to install for the control requirements as applicable to

process vessels as published in the Federal Register on April 4, 2002, and, if the final requirements are more stringent than the draft requirements, to meet the more stringent final MACT, HHHHH requirements through the Title V permit.

## **II. Operational Restrictions**

1. All OC emissions generated during pump-in and solvent blending in emissions units shall vented to a control device that achieves a minimum 95% removal of OC emissions.
2. The permittee shall not blend and pump to a fill line more than 15 batches of coating per month from this emission unit.

## **III. Monitoring and/or Record keeping Requirements**

1. The permittee shall maintain monthly records for each batch of paint produced in the thin and shade tanks:
  - a. The identification of the formulation, date and volume of grind pumped into the tank;
  - b. The volume of each solvent added during each batch, in either pounds or gallons;
  - c. A calculation of the liquid organic material content in percent by weight solvent in the final product with a determination of the photochemical reactivity of the coating; and
  - d. The cumulative number of batches of coatings blended and pumped to the fill line from this emission unit.
2. The permittee shall monitor for OC concentrations at a minimum of one time per month in accordance with the Procedure for Organic Vapor Monitoring (OVM) attached to the letter submitted to Ohio EPA, CDO on December 13, 2000. The permittee shall maintain a monthly record on the OVM Log:.

The permittee shall maintain a record of all OVM Logs on file, which shall be made available to representatives of the Ohio EPA, upon request.

## **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify any of the following occurrences:
  - a. Each month during which 15 batches of coating were blended and pumped to a fill line from this emission unit;
  - b. Each month during which OVM was not performed;
  - c. Each instance when a corrective action, that was to be performed as a result of an OVM, was not implemented; and

- d. Each day during which a higher emitting coating is manufactured as compared to the "worse case" coating.

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

- 2. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. This reporting requirement may be satisfied by including and identifying the specific emissions data for this emissions unit in the annual Fee Emission Report.

## **V. Testing Requirements**

- 1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
OC emissions shall not exceed 1.68 lbs/batch.

**Applicable Compliance Method:**

Compliance shall be determined by using the method described in the Emission Inventory Improvement Program (EIIP), Chapter 8 "Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities" assuming 100% capture and 95% control efficiency.  $E = \frac{P(X)V(MW)}{RT}$ : Where P = 0.9364 psia; MW = 96.66 lb/mol; X = 1 mole; R = 10.731 psia ft<sup>3</sup>/lbmol R; V = 241 ft<sup>3</sup>; T = 585 R (125 F);  $E = \frac{0.9364 \text{ psia} (1 \text{ mole}) 241 \text{ ft}^3 (96.66 \text{ lb/mol})}{10.731 \text{ psia ft}^3/\text{lbmol R} (585 \text{ R})} = 3.47 \text{ lbs} * (1 - 0.95) = 0.17 \text{ lb OC}$ .

- b. Emission Limitation:  
OC emissions shall not exceed 0.15 ton per year.

**Applicable Compliance Method:**

Compliance shall be assumed as long as the permittee does not exceed that monthly batch emission restriction because the emission is based on the maximum potential to emit.

## **VI. Miscellaneous Requirements**

None

**B. State Only Enforceable Section**

**I. 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>
P179 - 5,000 gallon thin and shade tank for solvent-based coating production vented to zeolite cannister 355	None	None

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None