OhioEPA

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

09/23/05

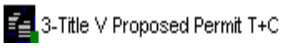
CERTIFIED MAIL

RE: Proposed Title V Minor Permit Modification Chapter 3745-77 permit

16-52-05-0060
PLASTI-KOTE CO., INC.

Attn: Genevieve Damico AR-18J
United States Environmental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for PLASTI-KOTE CO., INC., has been created in Ohio EPA's State Air Resources System (STARS) on 09/23/05, for review by USEPA. This proposed action is identified in STARS as 

covering the facility specific terms and conditions, and 

covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's electronic notification of this proposed action. Please contact me at (614) 644-3631 before the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Michael W. Ahern

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

cc: Akron Air Pollution Control
File, DAPC PMU

State of Ohio Environmental Protection Agency

PROPOSED TITLE V MINOR PERMIT MODIFICATION

Original Effective Date:	Expiration Date:	Modification Effective Date: ***To be enetered upon final issuance***

This document constitutes issuance of a Title V permit for Facility ID: 16-52-05-0060 to:
The duration of this permit will be five years.

PLASTI-KOTE CO., INC.
1000 LAKE ROAD
P.O. BOX 708
MEDINA, OH 44256-3598

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

K001 (Spray Booth #2)
Painting of No. 202 plastic caps for spray paint product cans.

K002 (Spray Booth #3)
Painting of No. 202 and No. 211 plastic caps for spray paint product cans.

K003 (Spray Booth #4)
Painting of No. 211 plastic caps for spray paint product cans.

P002 (Filling Line #1)
Aerosol Gassing Equipment - Kartridge Pak 9 - Head under-cap gasser / crimper.

P003 (Filling Line #2)
Aerosol Gassing Equipment - Kartridge Pak 9 - Head under-cap gasser / crimper..

P004 (Filling Line #3)
Aerosol Gassing Equipment - Kartridge Pak 6 - Head under-cap gasser / crimper.

P005 (Filling Line #4)
Aerosol Gassing Equipment - Terco index filler.

P006 (Filling Line #5)
Aerosol Gassing Equipment - Kartridge Pak 9 - Head rotary pressure filler.

P007 (Specialty Products Mixing Room)
Fleckstone (multi-colored texture paint) mixing and blending area.

P009 (Paint Mixing Station #1)
Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system.

P010 (Paint Mixing Station #2)
Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system.

P011 (Paint Mixing Station #3)
Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system.

P012 (Paint Mixing Station #7)
Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system.

P013 (Paint Mixing Station #4)
Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel.

P014 (Paint Mixing Station #9)
Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel.

P015 (Paint Mixing Station #12)
Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel.

P016 (Paint Mixing Station #13)
Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel.

P017 (Paint Mixing Station #14)
Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel.

P018 (T057 large mixing tank
)
New 1000 gal mising tank. PTI 16-01990

P019 (T059 large mixing tank)
New mixing tank 1000 gal. PTI 16-01990

P020 (T058 large mixing tank)
New mixing tank 2000 gal. PTI 16-01990

P021 (Degassing Booth)
Removal of propellant gas (propane) from scrap product paint spray cans.

P022 (Paint Mixing Station #5)
Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system.

P023 (Paint Mixing Station #6)
Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system.

P024 (Paint Mixing Station #8)
Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system.

P025 (Automatic Tank Washing Station)
Acetone tank washer for main mixing room. Closed system.

P026 (Manual Tank Washing Station)
Manual tank washing station for main mixing room

R003 (Spray Booth #6)
Painting of Fleckstone plastic caps for spray paint product cans.

R004 (Spray Booth #1)
Automatic loading and painting of plastic caps for spray paint product cans.

R005 (Spray Booth #5)
Painting of scratch color plastic caps for spray paint product cans.

R006 (Spray Booth #7)
Painting of Fleckstone plastic caps for spray paint product cans.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Akron Air Pollution Control
146 South High Street, Room 904
Akron, OH 44308
(330) 375-2480

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

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, i.e., in Section A.III of Part III of this Title V permit, 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter.

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those

reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit**,** and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable

requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall 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”); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

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.
(Authority for term: OAC rule 3745-77-07(A)(5))

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.
(Authority for term: OAC rule 3745-77-07(A)(6))

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, in accordance with A.10 below. 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.

f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:

i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

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.
(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. 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.
(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 paragraph (E) of OAC rule 3745-77-03.

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.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

ii. Compliance certifications shall include the following:
(a) An identification of each term or condition of this permit that is the basis of the certification.

(b) The permittee's current compliance status.

(c) Whether compliance was continuous or intermittent.

(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed

under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

22. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

B. ***State Only Enforceable Section***

1. 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 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 (i) any deviations (excursions) from 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, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. Records Retention Requirements

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

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. Scheduled Maintenance/Malfunction Reporting

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

5. 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.

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations

occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or

b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. Plasti-Kote Co., Inc. has requested to restrict the emissions of any individual hazardous air pollutant (HAP) to 9.5 tons per rolling, 12-month period, the emissions of total combined hazardous air pollutants (HAPs) to 24.5 tons per rolling, 12-month period, and the emissions of volatile organic compounds (VOC) to 249.4 tons per rolling, 12-month period. The company proposed these emission limits to avoid being classified as a major source for PSD and to avoid being classified as a major source as defined in section 63.2 of 40 CFR Part 63 for any upcoming Maximum Achievable Control Technology (MACT) standards (i.e., Miscellaneous Organic Chemical Production and Processes, 40 CFR Part 63, Subpart FFFF, and Plastic Parts (surface coating), 40 CFR Part 63, Subpart PPPP) . Plasti-Kote Co., Inc. has accepted these emission limits as facility-wide caps on emissions from the following emissions units: B002, B003, K001, K002, K003, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, R003, R004, R005, R006, R007, T001, T002, T003, T004, T005, T006, T007, T008, T009, T010, T011, T012, T013, T014, T015, T016, T022, T023, T024, T025, Z002, Z005, Z018, Z020, Z021, Z022, Z023, Z024, Z025, Z029, Z030, Z031, Z059, Z060, Z061, Z062, Z063, Z064, Z065, Z066, Z067, Z068, Z069, Z070, Z071, Z072, Z073, and Z074.

2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC	Maximum Allowable Cumulative Emissions of Each Individual HAP	Maximum Allowable Cumulative Emissions of Total Combined HAPs
1	62.4 tons	2.4 ton	6.1 tons
1-2	79.4 tons	3.0 tons	7.8 tons
1-3	96.4 tons	3.7 tons	9.4 tons
1-4	113.4 tons	4.3 tons	11.1 tons
1-5	130.4 tons	5.0 tons	12.8 tons
1-6	147.4 tons	5.6 tons	14.5 tons
1-7	164.4 tons	6.3 tons	16.1 tons
1-8	181.4 tons	6.9 tons	17.8 tons
1-9	198.4 tons	7.6 tons	19.5 tons
1-10	215.4 tons	8.2 tons	21.2 tons
1-11	232.4 tons	8.9 tons	22.8 tons
1-12	249.4 tons	9.5 tons	24.5 tons

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual emission limitation for VOC, individual HAP, and total combined HAPs shall be based upon a rolling, 12-month summation of the monthly emissions.

3. In order to determine compliance with the facility-wide emission limitations, the permittee shall maintain monthly records of the following information for emissions units K001, K002, K003, P002, P003, P004, P005, P006, P007, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, R003, R004, R005, and R006:

A. State and Federally Enforceable Section (continued)

3.a For emissions units K001, K002, K003, R003, R004, R005, and R006:

i. the name and identification number of each coating, as applied;

ii. the VOC content of each coating in pounds of VOC per gallon of coating, as applied;

iii. the individual HAP* content for each HAP of each coating, in weight percent (ratio of each individual HAP to VOC), as applied;

iv. the combined HAPs content of each coating, in weight percent (ratio of combined HAPs to VOC), as applied (sum all the individual HAP contents from (iii));

v. the number of gallons of each coating employed;

vi. the name and identification of each cleanup material employed;

vii. the VOC content of each cleanup material, in pounds of VOC per gallon of cleanup material, as applied;

viii. the individual HAP content for each HAP of each cleanup material, in weight percent (ratio of each individual HAP to VOC), as applied;

ix. the combined HAPs content of each cleanup material, in weight percent (ratio of combined HAPs to VOC), as applied (sum all the individual HAP contents from (viii));

x. the number of gallons of each cleanup material employed;

xi. the total VOC from all coatings employed, in tons per month (the sum of (ii) times (v) for each coating, then divide by 2000 lbs/ton);

xii. the total VOC from all cleanup materials employed, in tons per month (the sum of (vii) times (x) for each cleanup material, then divide by 2000 lbs/ton);

xiii. the total VOC from all coatings and cleanup materials employed, in tons per month (i.e., (xi) plus (xii));

xiv. the total individual HAP emissions for each HAP from all coatings employed, in tons per month (for each HAP the sum of (iii) divided by 100 times (xi) for each coating);

xv. the total individual HAP emissions for each HAP from all cleanup materials employed, in tons per month (for each HAP the sum of (viii) divided by 100 times (xii) for each cleanup material);

xvi. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month (i.e., (xiv) plus (xv));

xvii. the total combined HAPs emissions from all coatings employed, in tons per month (the sum of (iv) divided by 100 times (xi) for each coating);

xviii. the total combined HAPs emissions from all cleanup materials employed, in tons per month (the sum of (ix) times (xii) for each cleanup material); and

xix. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month (i.e., (xvii) plus (xviii)).

Note: The permittee may use a spreadsheet (i.e., the spreadsheets provided in the June 12, 2000 letter from the facility) to maintain the above-mentioned records and to do the emission calculations.

* A listing of the HAPs can be found in section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

A. State and Federally Enforceable Section (continued)

3.b For emissions units P002, P003, P004, P005, and P006:

i. the total number of aerosol paint cans filled using emissions units P002, P003, and P004;

ii. the total number of aerosol paint cans filled using emissions units P005 and P006; and

iii. the VOC emission rate from gassing, in tons per month (i.e., the sum of the product of (i) times 0.0048 pounds of VOC per can* plus the product of (ii) times 0.002168 pounds of VOC per can*, divided by 2000 lbs/ton).

* Emission factor is based on manufacturing and/or stack testing data supplied by the permittee in correspondence dated April 25, 2001.

Note: The VOC , individual HAP, and combined HAPs emissions from the filling of paint into the can for emissions unit P002, P003, P004, P005, and P006 are listed under A.3.h below. The VOC, individual HAP, and combined HAPs emissions from the mixing prior to filling the can with paint is determined under A.3.d below.

3.c For emissions unit P007:

i. the company identification for each solvent and cleanup material employed;

ii. the throughput of each cleanup material employed, in gallons;

iii. the VOC emission rate for all cleanup materials, in pounds per month (i.e., the sum of (ii) times the derived emissions factor* for each cleanup material);

iv. the individual HAP emission rate for each HAP for all cleanup materials, in pounds per month (i.e., the sum of (ii) times the derived emissions factor* for each HAP for each cleanup material);

v. the combined HAP emission rate for all cleanup materials, in pounds per month (i.e., the sum of (ii) times the derived emissions factor* for each cleanup material);

vi. the total amount of product produced, in gallons;

vii. the VOC emission rate for the solvent, in pounds per month (i.e., (vi) times the product density** times the weight fraction of solvent** times 0.01 (AP-42, Section 6.4.1, dated 5/83));

viii. the individual HAP emission rate for each for the solvent, in pounds per month (i.e., (vi) times the product density** times the weight fraction of each individual HAP for each HAP** times 0.01 (AP-42, Section 6.4.1, dated 5/83));

ix. the combined HAP emission rate for the solvent, in pounds per month (i.e., (vi) times the product density** times the weight fraction of combined HAPs** times 0.01 (AP-42, Section 6.4.1, dated 5/83));

x. the total VOC emission rate for the solvent and all cleanup materials, in tons per month (i.e., (iii) plus (vii), then divided by 2000 lbs/ton);

xi. the individual HAP emission rate for each HAP for the solvent and all cleanup materials, in tons per month (i.e., (iv) plus (viii), then divided by 2000 lbs/ton); and

xii. the combined HAP emission rate for the solvent and all cleanup materials, in tons per month (i.e., (v) plus (ix), then divided by 2000 lbs/ton).

A. State and Federally Enforceable Section (continued)

*Derived emission factors are from the "Summary of Estimated VOM Emission Rates Vessel Clean-up" document in the PTI application date October 21, 1999. Note: Currently no HAP emissions from the cleanup material.

**The permittee may use a "worst-case" product density and "worst-case" weigh fraction for solvent, individual HAP, and combined HAP instead of actual numbers. If a "worst-case" number is used, the permittee shall have documentation to verify the "worst-case" numbers.

3.d For emissions units P009, P010, P011, P012, P013, P014, P015, P016, P017, P022, P023, P024, and the mixing prior to filling the aerosol paint cans:

i. the total throughput of paint, in pounds per month;

ii. the VOC emission rate from filling and surface evaporation, in tons per month (i.e., using the spreadsheets titled Paint Making, Emissions Calculations - Loading Operation and Paint Making, Emissions Calculations - Mixing Operation which uses EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-18);

iii. the individual HAP emission rate for each HAP from filling and surface evaporation, in tons per month (i.e., using the spreadsheets titled Paint Making, Emissions Calculations - Loading Operation and Paint Making, Emissions Calculations - Mixing Operation which uses EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-18); and

iv. the combined HAPs emission rate from filling and surface evaporation, in tons per month (i.e., the sum of the individual HAP emission rates from (iii)).

3.e For emissions units P018, P019, and P020:

i. the total throughput of paint, in pounds per month;

ii. the VOC emission rate from filling and surface evaporation, in tons per month (i.e., using the spreadsheets titled Large Mixing Tanks, Emissions Calculations - Loading Operation and Large Mixing Tanks, Emissions Calculations - Mixing Operation which uses EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-18);

iii. the individual HAP emission rate for each HAP from filling and surface evaporation, in tons per month (i.e., using the spreadsheets titled Large Mixing Tanks, Emissions Calculations - Loading Operation and Large Mixing Tanks, Emissions Calculations - Mixing Operation which uses EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, equation 8.4-1 and equation 8.4-18); and

iv. the combined HAPs emission rate from filling and surface evaporation, in tons per month (i.e., the sum of the individual HAP emission rates from (iii)).

3.f For emissions unit P021:

i. the number of cans degassed per month; and

ii. the VOC emission rate, in tons per month (i.e., multiply (i) times 0.191875 pound of VOC per can degassed*, then divide by 2000 lbs/ton).

* Emission factor supplied by the permittee in correspondence dated September 15, 2000.

A. State and Federally Enforceable Section (continued)

3.g For emissions unit P025:

i. the name and identification of each cleanup material employed;

ii. the VOC content of each cleanup material, in pounds of VOC per gallon of cleanup material, as applied;

iii. the individual HAP* content for each HAP of each cleanup material, in weight percent, as applied;

iv. the combined HAPs content of each cleanup material, in weight percent, as applied (i.e., sum all the individual HAP contents from (iii));

v. the number of batches;

vi. the total VOC from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Cleaning Operation Emissions: automatic tank washing machine to determined the emissions);

vii. the total individual HAP emissions for each HAP from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Cleaning Operation Emissions: automatic tank washing machine to determined the emissions); and

viii. the total combined HAPs emissions from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Cleaning Operation Emissions: automatic tank washing machine to determined the emissions).

* A listing of the HAPs can be found in section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

3.h For emissions unit P026:

i. the name and identification of each cleanup material employed;

ii. the VOC content of each cleanup material, in pounds of VOC per gallon of cleanup material, as applied;

iii. the individual HAP* content for each HAP of each cleanup material, in weight percent, as applied;

iv. the combined HAPs content of each cleanup material, in weight percent, as applied (i.e., sum all the individual HAP contents from (iii));

v. the number of batches;

vi. the total VOC from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Cleaning Operation Emissions: paint-portable tank washing - manual to determined the emissions);

vii. the total individual HAP emissions for each HAP from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Cleaning Operation Emissions: paint-portable tank washing - manual to determined the emissions); and

viii. the total combined HAPs emissions from all cleanup materials employed, in tons per month (i.e., the permittee may use the spreadsheet titled Cleaning Operation Emissions: paint-portable tank washing - manual to determined the emissions).

* A listing of the HAPs can be found in section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

A. State and Federally Enforceable Section (continued)

3.i The following table is a list of all the insignificant emissions units and the insignificant emissions units' potentials to emit (PTE) for VOC, individual HAP, and combined HAP:

Emissions Unit ID	PTE for VOC (tpy)	PTE for individual HAP (tpy)	PTE for combined HAPs (tpy)
B002	0.0992	0.034	0.034
B003	0.1984	0.068	0.068
P002, P003, P004, P005, and P006*	3.93	0.79	3.144
P008	1.16	0.19	0.5
P027	0.65	0.18	0.30
P028	0.97	0.88	0.97
P029 and P030	0.26	0.06	0.13
P031, P032, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, and P044	0.21	0.14	0.29
P045	0.94	0.75	0.94
P046	0.61	0.13	0.20
R007	0.79	0.08	0.22
T001	0.262	0.262	0.262
T002	0.1895	0.1895	0.1895
T003	0.074	0.074	0.074
T004	0.11	0.11	0.11
T006	0.2385	0.15	0.15
T007	0.131	0.09	0.09
T008	0.7735	0.193375	0.193375
T009	0.4015	0.00803	0.00803

A. State and Federally Enforceable Section (continued)

T010	0.0895	0.0895	0.0895
T011	0.1335	0.09	0.09
T012	0.15	0.15	0.15
T013	0.139	0.11	0.11
T022	0.1	0.04	0.04
T023	0.1	0.06	0.06
T024	0.1	0.07	0.07
T025	0.16	0.13	0.13
Z002	0.03	0.0	0.0
Z005	1.57	0.0	0.0
Z018	0.11	0.10	0.11
Z020, Z021, Z022, Z023, Z024, and Z025	0.942	0.18	0.43
Z029, Z030, and Z031	0.26	0.08	0.16
Z059	0.34	0.068	0.085
Z060, Z061, Z062, Z063, Z064, Z065, Z066, Z067, Z068, Z069, Z070, Z071, and Z072	1.247	0.58	1.21
Z073	0.11	0.005	0.0126
Z074	1.079	1.079	1.079
TOTAL	18.6576	7.210405	11.699005

A. State and Federally Enforceable Section (continued)

The potentials to emit for the above-mentioned insignificant emissions units are based on the assumed inherent physical limitations that are listed in Table 1 of the letter dated October 1, 2001 from Plasti-kote Co., Inc.

One twelfth of the total annual emissions shall be added to the monthly emissions calculations (i.e., 1.5548 tons of VOC per month, 0.60087 ton of individual HAP per month, and 0.974917 tons of combined HAPs per month).

*The emissions from the filling of aerosol paint cans only.

The permittee shall not employ any material which contains any of the HAPs listed in section 112(b) of the Clean Air Act in emissions units Z002 and Z005. The permittee shall maintain documentation to prove that each material employed does not contain any HAPs.

The permittee shall submit deviation (excursion) reports that identify any day during which any material was employed in emissions units Z002 and/or Z005 which contains any of the HAPs listed in section 112(b) of the Clean Air Act. These reports shall be sent to the Akron RAQMD within 30 days after any such material is employed.

3.j For the entire facility:

i. the total VOC emission rate for the entire facility, in tons per month (i.e., (A.3.a.xiii) plus (A.3.b.iii) plus (A.3.c.x) plus (A.3.d.ii) plus (A.3.e.ii) plus (A.3.f.ii) plus (A.3.g.vi) plus (A.3.h.vi) plus 1.5548);

ii. the total individual HAP emission rate for each HAP for the entire facility, in tons per month (i.e., (A.3.a.xvi) plus (A.3.c.xii) plus (A.3.d.iii) plus (A.3.e.iii) plus (A.3.g.vii) plus (A.3.h.vii) plus 0.60087));

iii. the total combined HAPs emission rate for all emissions units, in tons per month (i.e., (A.3.a.xix) plus (A.3.c.xiii) plus (A.3.d.iv) plus (A.3.e.iv) plus (A.3.g.viii) plus (A.3.h.viii) plus 0.974917);

iv. during the first 12 calendar months of operations following the issuance of this permit, the cumulative emissions of each individual HAP, total combined HAPs, and VOC for the entire facility for each calendar month; and

v. beginning after the first 12 calendar months of operations following the issuance of this permit, the rolling, 12-month summation of the monthly emissions of each individual HAP, total combined HAPs, and VOC for the entire facility for each calendar month.

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitations for VOC, individual HAP, and total combined HAPs and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

5. The permittee shall submit annual reports that specify the following information:

a. for the entire facility, the rolling, 12-month summations of the monthly emissions of VOC, individual HAP, and total combined HAPs for each month during the calendar year (January through December); and

b. for the entire facility, the cumulative emissions of VOC, each individual HAP, and total combined HAPs for each month for the first 12 calendar months of operation following the issuance of this permit.

The annual reports shall be submitted by April 15 of each year, and shall cover the records for the previous calendar year (January through December).

6. Compliance with the emission limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:

A. State and Federally Enforceable Section (continued)

6.a Emission Limitation:

9.5 tons of individual HAP per rolling, 12-month period
24.5 tons of total combined HAPs per rolling, 12-month period
249.4 tons of VOC per rolling, 12-month period

Applicable Compliance Method:

Monthly record keeping in accordance with sections A.3, A.3.a, A.3.b, A.3.c, A.3.d, A.3.e, A.3.f, A.3.g, A.3.h, and A.3.j of these terms and conditions.

7. The material employed to gas the aerosol paint cans on the paint filling lines (P002, P003, P004, P005, and P006) and on the rework gasser (Z002) shall not contain any of the HAPs listed in section 112(b) of the Clean Air Act. The permittee shall maintain documentation to prove that each material employed does not contain any HAPs.

The permittee shall submit deviation (excursion) reports that identify any day during which any material was employed to gas the aerosol paint cans on the paint filling lines (P002, P003, P004, P005, and P006) and on the rework gasser (Z002) which contains any of the HAPs listed in section 112(b) of the Clean Air Act. These reports shall be sent to the Akron RAQMD within 30 days after any such material is employed.

8. The permittee shall only store acetone in emissions unit T005.

The permittee shall submit deviation (excursion) reports that identify any day during which any material other than acetone was stored in emissions unit T005. These reports shall be sent to the Akron RAQMD within 30 days after any such material is stored.

A. State and Federally Enforceable Section (continued)

9. The following insignificant emissions units are located at this facility:

B002 - boiler #1;
B003 - boiler #2 (PTI 16-057);
P008 - bulk paint filling line of 1 oz. and 2 oz. jars of touch-up paint (PTI 16-1332);
P027 - SW mill (PTI 16-02334);
P028 - tank L-1 multi-run (PTI 16-02334);
P029 - mill pre-mix station #1 (PTI 16-02334);
P030 - mill pre-mix station #2 (PTI 16-02334);
P031 - car color paint mixing station #7 (PTI 16-02334);
P032 - car color paint mixing station #8 (PTI 16-02334);
P033 - car color paint mixing station #9 (PTI 16-02334);
P034 - car color paint mixing station #10 (PTI 16-02334);
P035 - car color paint mixing station #11 (PTI 16-02334);
P036 - car color paint mixing station #12 (PTI 16-02334);
P037 - car color paint mixing station #13 (PTI 16-02334);
P038 - car color paint mixing station #14 (PTI 16-02334);
P039 - car color paint mixing station #1;
P040 - car color paint mixing station #2;
P041 - car color paint mixing station #3;
P042 - car color paint mixing station #4;
P043 - car color paint mixing station #5;
P044 - car color paint mixing station #6;
P045 - solvent recovery unit (PTI 16-02415);
P046 - process tank for Java Brown (PTI 16-02417);
R007 - QC spray booth (PTI 16-02334);
T001 - 5,000-gallon fixed roof storage tank;
T002 - 10,000-gallon fixed roof storage tank;
T003 - 5,000-gallon fixed roof storage tank;
T004 - 5,000-gallon fixed roof storage tank;
T005 - 15,000-gallon fixed roof storage tank;
T006 - 5,000-gallon fixed roof storage tank;
T007 - 10,000-gallon fixed roof storage tank;
T008 - 10,000-gallon fixed roof storage tank;
T009 - 10,000-gallon fixed roof storage tank;
T010 - 3,000-gallon fixed roof storage tank (PTI 16-561);
T011 - 3,000-gallon fixed roof storage tank (PTI 16-561);
T012 - 4,500-gallon fixed roof storage tank (PTI 16-1226);
T013 - 10,000-gallon fixed roof storage tank (PTI 16-1226);
T014 - 10,000-gallon fixed roof storage tank;

A. State and Federally Enforceable Section (continued)

T015 - 1,850-gallon fixed roof storage tank (PTI 16-1314);
T016 - 3,500-gallon fixed roof storage tank (PTI 16-1314);
T022 - 10,000-gallon vertical cylindrical storage tank (PTI 16-02069);
T023 - 10,000-gallon vertical cylindrical storage tank (PTI 16-02069);
T024 - 10,000-gallon vertical cylindrical storage tank (PTI 16-02069);
T025 - 10,000-gallon vertical above ground storage tank (PTI 16-02324);
Z005 - automatic drum washer for specialty products mixing room;
Z018 - ball mill;
Z020 - paste concentrate storage tank #1;
Z021 - paste concentrate storage tank #2;
Z022 - paste concentrate storage tank #3;
Z023 - paste concentrate storage tank #4;
Z024 - paste concentrate storage tank #5;
Z025 - paste concentrate storage tank #6;
Z029 - sand mill #1;
Z030 - sand mill #2;
Z031 - sand mill #3;
Z059 - lid cleaning;
Z060 - 2,500-gallon fixed roof storage tank (T022*);
Z061 - 2,500-gallon fixed roof storage tank (T023*);
Z062 - 6,000-gallon fixed roof storage tank (T024*);
Z063 - 5,600-gallon fixed roof storage tank (T025*);
Z064 - 5,000-gallon fixed roof storage tank (T026*);
Z065 - 6,000-gallon fixed roof storage tank (T027*);
Z066 - 6,000-gallon fixed roof storage tank (T028*);
Z067 - 6,000-gallon fixed roof storage tank (T029*);
Z068 - 6,000-gallon fixed roof storage tank (T030*);
Z069 - 3,500-gallon fixed roof storage tank (T031*);
Z070 - 2,800-gallon fixed roof storage tank (T032*);
Z071 - 1,200-gallon fixed roof storage tank (T033*);
Z072 - 5,500-gallon fixed roof storage tank (T034*);
Z073 - diesel-fired emergency fire water pump; and
Z074 -14 ink-jet printers.

Each insignificant emissions unit at this facility must comply with all applicable State and Federal regulations, and as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the federally - approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

*The permittee incorrectly designated the Ohio EPA IDs for the insignificant storage tanks (T022 through T034). Ohio EPA files do not have any records for these storage tanks. Ohio EPA files show that there are three 10,000-gallon storage tanks designated as T022, T023, T024. For these reasons, the Ohio EPA IDs were changed to Z0XX.

B. State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z002 - rework gasser.

2. For each emissions unit listed in the Title V application as insignificant because of Ohio Revised Code (ORC) 3704.036, that was installed after January 1, 1974 and has not applied for and obtained a permit to install, the permittee shall submit a complete permit to install application within 30 days after the final issuance of the Title V permit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Spray Booth #2 (K001)

Activity Description: Painting of No. 202 plastic caps for spray paint product cans.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
surface coating line for plastic caps - paint spray booth #2	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information for this emissions unit:

a. the MSDS sheets for each coating and cleanup material employed;

b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and

c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document, prior to employing the new coating or cleanup material, whether or not it is a photochemically reactive material.

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each day that any photochemically reactive material (coating or cleanup material) is employed in the coating line, the permittee shall collect and record the following information for each such day for this emissions unit:

a. the company identification for each coating and cleanup material employed;

b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material;

c. the number of gallons of each coating and photochemically reactive cleanup material employed;

d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

e. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

f. the total number of hours the emissions unit was in operation; and

g. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. for the days during which any photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and

b. for the days during which a photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

V. Testing Requirements

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

1.a Emission Limitations:

8.0 lbs/hr of organic compounds (OC)
40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and photochemically reactive cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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 - Terms and Conditions for Emissions Units

Emissions Unit ID: Spray Booth #3 (K002)

Activity Description: Painting of No. 202 and No. 211 plastic caps for spray paint product cans.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Binks HVLP spray gun, spray booth - heat lamps drying chamber - surface coating line for plastic caps - spray booth #3	OAC rule 3745-31-05(A)(3) (PTI 16-01940)	117.0 lbs/day of volatile organic compounds (VOC) for coatings 252.0 lbs/day of acetone for coatings 50.0 tpy of acetone for coatings and cleanup materials 2.41 tpy of particulate emissions The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(1), and 3745-21-07(G)(2).
	OAC rule 3745-31-05(C) (PTI 16-01940)	The maximum annual car color coating usage and red spot primer coating usage in this emissions unit shall not exceed 3000 gallons and 3550 gallons, respectively, based upon a rolling, 12-month summation of the coating usage figures. The VOC content of each car color coating and each red spot primer shall not exceed 2.91 pounds of VOC per gallon of coating and 0.98 pound of VOC per gallon of coating, respectively. 6.1 tons of VOC per rolling, 12-month period for coatings See A.II.1 below.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	0.551 lb/hr of particulate emissions
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.

2.b Note that acetone has been determined to not be "photochemically reactive" and, therefore, is not subject to the emission limitations established in OAC rule 3745-21-07 and pursuant to OAC rule 3745-31-05(D).

II. Operational Restrictions

1. The maximum annual car color coating usage and red spot primer coating usage in this emissions unit shall not exceed 3000 gallons and 3550 gallons, respectively, based upon a rolling, 12-month summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Car Color Coating Usage	Maximum Allowable Cumulative Red Spot Primer Coating Usage
1	428.6 gallons	507.1 gallons
1-2	857.1 gallons	1014.3 gallons
1-3	1285.7 gallons	1521.4 gallons
1-4	1714.3 gallons	2028.6 gallons
1-5	2142.9 gallons	2535.7 gallons
1-6	2571.4 gallons	3042.9 gallons
1-7	3000.0 gallons	3550.0 gallons
1-8	3000.0 gallons	3550.0 gallons
1-9	3000.0 gallons	3550.0 gallons
1-10	3000.0 gallons	3550.0 gallons
1-11	3000.0 gallons	3550.0 gallons
1-12	3000.0 gallons	3550.0 gallons

After the first 12 calendar months of operation following the issuance of permit to install 16-01940, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating usage figures.

2. The permittee shall only employ cleanup materials that do not contain any VOC, as defined in OAC rule 3745-21-01(B)(6).

3. The permittee shall operate a double frame filter for the control of particulate emissions when this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information for this emissions unit:

a. the MSDS sheets for each coating and cleanup material employed;

b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and

c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document, prior to employing the new coating or cleanup material, whether or not it is a photochemically reactive material.

2. For each day that any photochemically reactive material (coating or cleanup material) is employed in the coating line, the permittee shall collect and record the following information for each such day for this emissions unit:

a. the company identification for each coating and cleanup material employed;

b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material;

c. the number of gallons of each coating and photochemically reactive cleanup material employed;

d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

e. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

f. the total number of hours the emissions unit was in operation; and

g. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information for this emissions unit:

a. the name and identification of each cleanup material employed; and

b. documentation as to whether or not each cleanup material contains any VOC.

4. The permittee shall collect and record the following information each month for this emissions unit:

a. the total VOC emissions from all coatings, in tons (i.e., the sum of the daily VOC emissions in A.III.6.e for each month, divided by 2000 lbs/ton); and

b. beginning after the first 12 calendar months of operation following the issuance of permit to install 16-01940, the rolling, 12-month summation of the VOC emission figures.

Also, during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall record the cumulative VOC emissions for each calendar month.

III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall maintain monthly records of the following information:

a. the car color coating usage and the red spot primer coating usage for each month;

b. the VOC content of each car color coating and each red spot primer coating, in pounds per gallon; and

c. beginning after the first 12 calendar months of operation following the issuance of permit to install 16-01940, the rolling, 12-month summation of the coating usage figures.

Also, during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall record the cumulative coating usage for each calendar month.

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

a. the name and identification number of each coating employed;

b. the VOC content of each coating, in pounds per gallon;

c. the acetone content of each coating, in pounds per gallon;

d. the volume, in gallons, of each coating employed;

e. the total VOC emission rate for all coatings, in pounds per day (i.e., the sum of (b) times (d) for each coating); and

f. the total acetone emission rate for all coatings, in pounds per day (i.e., the sum of (c) times (d) for each coating).

7. The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each cleanup material employed;

b. the acetone content of each cleanup material, in pounds per gallon;

c. the volume, in gallons, of each cleanup material employed;

d. the acetone emission rate for all coatings, in tons per month (i.e., the sum of the daily acetone emissions in section A.III.6.f above for each month, divided by 2000 lbs/ton);

e. the acetone emission rate for all cleanup materials, in tons per month (i.e., the sum of (b) times (c) for each cleanup material, divided by 2000 lbs/ton); and

f. the total acetone emission rate for all cleanup materials and coatings, in tons per month (i.e., (d) plus (e)).

8. The permittee shall document whether or not the double frame filter was in service when the emissions unit was in operation.

9. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. for the days during which any photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly organic compound emissions for each such day; and

b. for the days during which a photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual organic compound emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the VOC emissions exceeded 6.1 tons as a rolling, 12-month average, the actual VOC emissions, in tons, during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative VOC emission levels.

3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. an identification of each month during which the car color coating usage exceeded 3000 gallons as a rolling, 12-month average, the actual car color coating usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative coating usage levels; and

b. an identification of each month during which the red spot primer coating usage exceeded 3550 gallons as a rolling, 12-month average, the actual red spot primer coating usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative coating usage levels.

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a cleanup material containing VOC (as defined in OAC rule 3745-21-01(B)(6)) is employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.

5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a car color coating and/or a red spot primer coating that exceeds the VOC content limitations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.

6. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the double frame filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Direct (the appropriate District Office or local air agency) within 30 days after the event occurs.

7. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the VOC emissions from coatings exceeded 117.0 lbs/day, and the actual daily VOC emissions for each such day.

8. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the acetone emissions from coatings exceeded 252.0 lbs/day, and the actual daily acetone emissions for each such day.

9. The permittee shall also submit annual reports that specify the total acetone and the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

10. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitations:

8.0 lbs/hr of organic compounds (OC)
40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and photochemically reactive cleanup materials.

1.b Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

1.c Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

E = maximum coating solids usage rate in pounds per hour x (1-TE) x (1-CE)

E = particulate emissions rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

If required, compliance shall also be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

1.d Emission Limitation:

6.1 tons of VOC per rolling, 12-month period for coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.4 and A.III.6. Formulation data or US EPA Method 24 shall be used to determine the VOC content for each coating.

V. Testing Requirements (continued)

1.e Emission Limitation:

117.0 lbs/day of VOC for coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.6. Formulation data or US EPA Method 24 shall be used to determine the VOC content for each coating.

1.f Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

E = [maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE) x 8760]/2000

E = particulate emissions rate (tons per year)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

1.g Emission Limitation:

252.0 lbs/day of acetone for coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.6. Formulation data shall be used to determine the acetone content for each coating.

1.h Emission Limitation:

50.0 tpy of acetone for coatings and cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.6 and A.III.7. Formulation data shall be used to determine the acetone content for each coating and cleanup material.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Binks HVLP spray gun, spray booth - heat lamps drying chamber - surface coating line for plastic caps - spray booth #3	none	See B.VI.1 below.

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

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit was install prior to the Ohio EPA's Air Toxic Policy. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Spray Booth #4 (K003)

Activity Description: Painting of No. 211 plastic caps for spray paint product cans.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
plastic cap coating line consisting of a binks HVLP automatic spray gun, conveyor, spray booth, heat lamp drying chamber - Spray Booth 4	OAC rule 3745-31-05(A)(3) (PTI 16-02317)	307.0 pounds of organic compounds (OC) per day for coatings 64.0 tons of OC per year from all coatings and cleanup materials employed 149.0 pounds of volatile organic compounds (VOC) per day for coatings 35.0 tons of VOC per year from all coatings and cleanup materials employed 0.1 pound of particulate emissions (PE) per hour 0.44 ton of PE per year Visible particulate emissions from any stack shall not exceed 5% opacity, as a 6-minute average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-07(G)(2).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(C)	The maximum annual crackle top coating usage shall not exceed 1000 gallons based upon a rolling, 12-month summation of the coating usage figures. 9.0 tons of any individual hazardous air pollutant (HAP) per year from all coatings and cleanup materials employed, as a rolling, 12-month summation See A.II.1 below.
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(G)(2)	When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour. See A.I.2.a below.

2. Additional Terms and Conditions

2.a Note that acetone has been determined to be not photochemically reactive and therefore is not included in the emission limitations established under OAC rule 3745-21-07(G)(2).

II. Operational Restrictions

1. The maximum annual crackle top coating usage for this emissions unit shall not exceed 1000 gallons, based upon a rolling, 12-month summation of the crackle top coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of permit to install (PTI) 16-02317, the permittee shall not exceed the crackle top coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage
1	83.0 gallons
1-2	167.0 gallons
1-3	250.0 gallons
1-4	333.0 gallons
1-5	417.0 gallons
1-6	500.0 gallons
1-7	583.0 gallons
1-8	667.0 gallons
1-9	750.0 gallons
1-10	833.0 gallons
1-11	917.0 gallons
1-12	1000.0 gallons

After the first 12 calendar months of operation following the issuance of PTI 16-02317, compliance with the annual crackle top coating usage limitation shall be based upon a rolling, 12-month summation of the crackle top coating usage figures.

2. The permittee shall operate a double frame filter when this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information:

a. the crackle top coating usage for each month; and

b. beginning after the first 12 calendar months of operation following the issuance of PTI 16-02317, the rolling, 12-month summation of the crackle top coating usage figures.

Also, during the first 12 calendar months of operation following the issuance of PTI 16-02317, the permittee shall record the cumulative crackle top coating usage for each calendar month.

2. The permittee shall maintain records of the following information for the coating line:

a. the MSDS sheets for each coating and cleanup material currently employed;

b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and,

c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document prior to employing the new coating or cleanup material whether or not it is a photochemically reactive material.

III. Monitoring and/or Record Keeping Requirements (continued)

3. If it is determined that a photochemically reactive material is being employed in the coating line, the permittee shall collect and record the following information for each day for the coating line:

a. the company identification for each coating and cleanup material employed;

b. documentation of whether each coating or cleanup material employed is a photochemically reactive material;

c. the number of gallons of each coating and photochemically reactive cleanup material employed;

d. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation;

e. the permittee shall maintain information on each coating needed to calculate the OC emission rate (i.e., coating density, weight percent OC, etc.) in a spreadsheet. This information shall be updated by the permittee if any changes have been made to the coating formulations or if any new coatings are being employed;

f. the permittee shall maintain information on each photochemically reactive cleanup material needed to calculate the OC emission rate (i.e., cleanup material density, weight percent OC, etc.) in a spreadsheet. This information shall be updated by the permittee if any changes have been made to the cleanup material formulations or if any new cleanup materials are being employed;

g. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

h. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per hour (average) (i.e., (g)/(d)).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

4. The permittee shall collect and record the following information each day for the coating line:

a. the name and identification number of each coating employed;

b. the volume, in gallons, of each coating employed;

c. the permittee shall maintain information on each coating needed to calculate OC and VOC emission rates (i.e., coating density, weight percent OC, weight percent VOC, etc.) in a spreadsheet. This information shall be updated by the permittee if any changes have been made to the coating formulations or if any new coatings are being employed;

d. the total VOC emission rate for all coatings, in pounds per day; and,

e. the total OC emission rate for all coatings, in pounds per day.

III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall collect and record the following information each month for the coating line:

a. the name and identification number of each cleanup material employed;

b. the volume, in gallons, of each cleanup material employed;

c. the permittee shall maintain information on each cleanup material needed to calculate OC and VOC emission rates (i.e., cleanup material density, weight percent OC, etc.) in a spreadsheet. This information shall be updated by the permittee if any changes have been made to the cleanup material formulations or if any new cleanup materials are being employed;

d. the OC emission rate for all coatings, in tons per month (i.e., the sum of the daily OC emissions in Section A.III.4.e above for each month, then divided by 2000);

e. the VOC emission rate for all coatings, in tons per month (i.e., the sum of the daily VOC emissions in Section A.III.4.d above for each month, then divided by 2000);

f. the OC emission rate for all cleanup materials, in tons per month;

g. the VOC emission rate for all cleanup materials, in tons per month;

h. the total OC emission rate for all cleanup materials and coatings, in tons per month (i.e., (d) plus (f)); and

i. the total VOC emission rate for all cleanup materials and coatings, in tons per month (i.e., (e) plus (g)).

6. The permittee shall collect and record the following information each month for the coating line:

a. the name and identification number of each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the permittee shall maintain information on each coating and cleanup material needed to calculate each individual HAP emission rate (i.e., coating density, weight percent of each HAP, etc.) in a spreadsheet. This information shall be updated by the permittee if any changes have been made to the coating and/or cleanup material formulations or if any new coatings and/or cleanup materials are being employed;

d. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month;

e. during the first 12 calendar months of operations following the issuance of PTI 16-02317, the cumulative emissions of each individual HAP for each calendar month; and

f. beginning after the first 12 calendar months of operations following the issuance of PTI 16-02317, the rolling, 12-month summation of the monthly emissions of each individual HAP for each calendar month.

* A listing of the HAPs can be found in section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials.

7. The permittee shall document whether or not the double frame filter was in service when the emissions unit was in operation.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month crackle top coating usage limitation and, for the first 12 calendar months of operation following the issuance of PTI 16-02317, all exceedances of the maximum allowable cumulative crackle top coating usage levels.

IV. Reporting Requirements (continued)

2. The permittee shall submit deviation (excursion) reports that include the following information:

a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and,

b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

3. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for any individual HAP and, for the first 12 calendar months of operation following the issuance of PTI 16-02317, all exceedances of the maximum allowable cumulative emission levels.

4. The permittee shall notify the Director (the Akron RAQMD) in writing of any record showing that the double frame filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Direct (the Akron RAQMD) within 30 days after the event occurs.

5. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the VOC emissions exceeded 149.0 pounds per day, and the actual daily VOC emissions for each such day.

6. The permittee shall submit deviation (excursion) reports that include an identification of each day during which the OC emissions exceeded 307.0 pounds per day, and the actual daily OC emissions for each such day.

7. The permittee shall also submit annual reports that specify the total OC and the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

8. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

1.a Emission Limitation:

8.0 pounds of organic compounds (OC) per hour

40 pounds of OC per day

Applicable Compliance Method:

Record keeping of coating and photochemically reactive cleanup material usage, organic compound content of each coating and photochemically reactive cleanup material, and operating hours per day as required in Section A.III.3 above. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and photochemically reactive cleanup materials.

1.b Emission Limitation:

Visible particulate emissions from any stack shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

OAC rule 3745-17-03(B)(1)

V. Testing Requirements (continued)

1.c Emission Limitation:

0.1 pound of PE per hour

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

E = maximum coating solids usage rate in pounds per hour x (1-TE) x (1-CE)

E = particulate emissions rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

1.d Emission Limitation:

0.44 ton of PE per year

Applicable Compliance Method:

Multiply the allowable PE limitation by 8760 hours per year, and then divide by 2000 pounds per ton.

1.e Emission Limitation:

149.0 pounds of VOC per day for coatings

Applicable Compliance Method:

Record keeping of coating usage and the VOC content of each coating as required in Section A.III.4 above. Formulation data or US EPA Methods 24 or 24A shall be used to determine the VOC content for each coating.

1.f Emission Limitation:

35.0 tons of VOC per year from all coatings and cleanup materials employed

Applicable Compliance Method:

Record keeping of coating and cleanup material usage and the VOC content of each coating and cleanup material as required in Sections A.III.4 and A.III.5 above. Formulation data or US EPA Methods 24 or 24A shall be used to determine the VOC content for each coating.

1.g Emission Limitation:

307.0 pounds of OC per day for coatings

Applicable Compliance Method:

Record keeping of coating usage and the OC content of each coating as required in Section A.III.4 above. Formulation data shall be used to determine the OC content for each coating.

V. Testing Requirements (continued)

1.h Emission Limitation:

64.0 tons of OC per year from all coatings and cleanup materials employed

Applicable Compliance Method:

Record keeping of coating and cleanup material usage and the OC content of each coating and cleanup material as required in Sections A.III.4 and A.III.5 above. Formulation data shall be used to determine the OC content for each coating.

1.i Emission Limitation:

9.0 tons of any individual HAP per year from all coatings and cleanup materials employed, as a rolling 12-month summation

Applicable Compliance Method:

Record keeping of coating and cleanup material usage and the HAP content of each coating and cleanup material as required in Sections A.III.6 above. Formulation data shall be used to determine the HAP content for each coating.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
plastic cap coating line consisting of a binks HVLP automatic spray gun, conveyor, spray booth, heat lamp drying chamber - Spray Booth 4	none	See B.III.1 below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (K003) 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):

Pollutant: Acetone
TLV (mg/m3): 1187
Maximum Hourly Emission Rate (lbs/hr): 7.95
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1302.0
MAGLC (ug/m3): 28261.9

Pollutant: Isopropyl Alcohol
TLV (mg/m3): 983
Maximum Hourly Emission Rate (lbs/hr): 0.26
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 42.7
MAGLC (ug/m3): 23404.8

Pollutant: Methyl Ethyl Ketone
TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 2.76
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 452.8
MAGLC (ug/m3): 14047.6

Pollutant: Methyl Isobutyl Ketone
TLV (mg/m3): 205
Maximum Hourly Emission Rate (lbs/hr): 1.25
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 205.1
MAGLC (ug/m3): 4881.0

Pollutant: Toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 1.99
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 326.5
MAGLC (ug/m3): 4476.2

Pollutant: Xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 2.72
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 446.2
MAGLC (ug/m3): 10333.3

III. Monitoring and/or Record Keeping Requirements (continued)

Pollutant: Methyl Acetate
TLV (mg/m3): 606
Maximum Hourly Emission Rate (lbs/hr): 2.47
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 405.2
MAGLC (ug/m3): 14428.6

Pollutant: Ethyl Benzene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 0.56
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 91.9
MAGLC (ug/m3): 10333.3

Pollutant: Ethyl Acetate
TLV (mg/m3): 1440
Maximum Hourly Emission Rate (lbs/hr): 0.59
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 96.8
MAGLC (ug/m3): 34285.7

Pollutant: Isobutyl Acetate
TLV (mg/m3): 152
Maximum Hourly Emission Rate (lbs/hr): 1.25
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 205.1
MAGLC (ug/m3): 3619.1

Pollutant: Diisobutyl Ketone
TLV (mg/m3): 145
Maximum Hourly Emission Rate (lbs/hr): 0.55
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 90.2
MAGLC (ug/m3): 3452.4

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.).

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.

III. Monitoring and/or Record Keeping Requirements (continued)

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Filling Line #1 (P002)

Activity Description: Aerosol Gassing Equipment - Kartridge Pak 9 - Head under-cap gasser / crimper.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint filling line #1	none	See A.I.2.a below.

2. Additional Terms and Conditions

2.a This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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 - Terms and Conditions for Emissions Units

Emissions Unit ID: Filling Line #2 (P003)

Activity Description: Aerosol Gassing Equipment - Kartridge Pak 9 - Head under-cap gasser / crimper..

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint filling line #2	none	See A.I.2.a below.

2. Additional Terms and Conditions

2.a This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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 - Terms and Conditions for Emissions Units

Emissions Unit ID: Filling Line #3 (P004)

Activity Description: Aerosol Gassing Equipment - Kartridge Pak 6 - Head under-cap gasser / crimper.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint filling line #3	none	See A.I.2.a below.

2. Additional Terms and Conditions

2.a This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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 - Terms and Conditions for Emissions Units

Emissions Unit ID: Filling Line #4 (P005)

Activity Description: Aerosol Gassing Equipment - Terco index filler.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint filling line #4	none	See A.I.2.a below.

2. Additional Terms and Conditions

2.a This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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 - Terms and Conditions for Emissions Units

Emissions Unit ID: Filling Line #5 (P006)

Activity Description: Aerosol Gassing Equipment - Kartridge Pak 9 - Head rotary pressure filler.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint filling line #5	none	See A.I.2.a below.

2. Additional Terms and Conditions

2.a This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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 - Terms and Conditions for Emissions Units

Emissions Unit ID: Specialty Products Mixing Room (P007)

Activity Description: Fleckstone (multi-colored texture paint) mixing and blending area.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Fleckstone production area	OAC rule 3745-31-05(A)(3) (PTI 16-1973)	0.5 lb/hr of particulate emissions 2.2 tpy of particulate emissions 3.53 lbs/hr of organic compounds (OC) 17.5 tpy of OC, including cleanup material emissions The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(1), and 3745-21-07(G)(2) as specified in section A.I.2.
	OAC rule 3745-17-07	See A.I.2.a below.
	OAC rule 3745-17-11	See A.I.2.b below.
	OAC rule 3745-21-07(G)(2)	See A.I.2.c and A.I.2.d below.

2. Additional Terms and Conditions

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

2.b The particulate emission limitation based on this applicable rule is less stringent than the particulate emission limitation established pursuant to the best available technology requirement specified in OAC rule 3745-31-05.

2.c A person shall not discharge more than 40 pounds of organic materials into the atmosphere in any one day from any article, machine, equipment, or other contrivance for employing, applying, evaporating or drying any photochemically reactive material, or substance containing such photochemically reactive material.

2. Additional Terms and Conditions (continued)

2.d The hourly OC emission limitation based on this applicable rule is less stringent than the hourly OC emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information for this emissions unit:

a. the MSDS sheets for each liquid organic raw material and cleanup material employed;

b. documentation as to whether or not each liquid organic raw material and cleanup material is a photochemically reactive material; and

c. when a new liquid organic raw material or cleanup material is going to be employed in this emissions unit, the permittee shall determine and document, prior to employing the new liquid organic raw material or cleanup material, whether or not it is a photochemically reactive material.

2. For each day that any photochemically reactive material (coating or cleanup material) is employed in this emissions unit, the permittee shall collect and record the following information for each such day for this emissions unit:

a. the company identification for each liquid organic raw material and cleanup material employed;

b. documentation of whether or not each liquid organic raw material and cleanup material employed is a photochemically reactive material;

c. the number of gallons of each photochemically reactive cleanup material employed;

d. the organic compound content of each photochemically reactive cleanup material, in pounds per gallon;

e. the organic compound emission rate for all photochemically reactive cleanup materials, in pounds per day (i.e., the sum of (c) times (d) for each photochemically reactive cleanup material);

f. the total amount of solvent employed, in pounds per day;

g. the organic compound emission rate for the solvent, in pounds per day (i.e., (f) times 0.01 (AP-42, Section 6.4.1, dated 5/83)); and

h. the total organic compound emission rate for the solvent and all photochemically reactive cleanup materials, in pounds per day (i.e., (e) plus (g)).

III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall collect and record the following information for each month for this emissions unit:

a. the company identification for each solvent and cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the organic compound content of each cleanup material, in pounds per gallon;

d. the organic compound emission rate for all cleanup materials, in pounds per month (i.e., the sum of (b) times (c) for each cleanup material);

e. the total amount of solvent employed, in pounds;

f. the organic compound emission rate for the solvent, in pounds per month (i.e., (e) times 0.01 (AP-42, Section 6.4.1, dated 5/83));

g. the total organic compound emission rate for the solvent and all cleanup materials, in tons per month (i.e., (d) plus (f), then divided by 2000 lbs/ton);

h. the total number of hours the emissions unit was in operation; and

i. the average hourly organic compound emission rate for the solvent and all cleanup materials, (i.e., [(d) plus (f)]/(h)).

4. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

5. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

2. The permittee shall submit quarterly deviation (excursion) reports that include the following information for the days during which a photochemically reactive material (coating or cleanup material) was employed: an identification of each day during which the organic compound emissions from the raw materials and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly organic compound emissions exceeded 3.53 lbs/hr, and the actual average hourly organic compound emissions for each such day.

4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

IV. Reporting Requirements (continued)

5. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures required in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

1.b Emission Limitation:

0.5 lb/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 20 pounds of particulate emissions per ton of pigment (AP-42, Table 6.4-1, dated 5/83) by the maximum hourly tons of pigment employed. Then multiply the resulting uncontrolled emission rate by an overall control factor of 81% (1-.81).

1.c Emission Limitation:

2.2 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the particulate emission factor of 20 pounds of particulate emissions per ton of pigment (AP-42, Table 6.4-1, dated 5/83) by the actual yearly tons of pigment employed. Then multiply the resulting uncontrolled emission rate by an overall control factor of 81% (1-.81), and then divide by 2000 lbs/ton.

1.d Emission Limitation:

40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data shall be used to determine the organic compound contents of the photochemically reactive cleanup materials.

1.e Emission Limitation:

3.53 lbs/hr of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

V. Testing Requirements (continued)

1.f Emission Limitation:

17.5 tpy of OC, including emissions from cleanup material

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3. Formulation data shall be used to determine the organic compound contents of the cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Fleckstone production area	none	See B.VI.1 below.

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

1. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Mixing Station #1 (P009)

Activity Description: Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #1	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. Additional Terms and Conditions

2.a The permittee shall employ a cover to reduce solvent evaporation losses.

2.b Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.

2.c Based on the "worst-case" emission scenario and using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

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

1.a Emission Limitations:

8 lbs/hr of OC
40 lbs/day of OC
7.3 tpy of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #1		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P009) 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):

Pollutant: acetone

TLV (mg/m3): 1188
Maximum Hourly Emission Rate (lbs/hr): 15.64
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240
MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.81
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 1.97
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
Maximum Hourly Emission Rate (lbs/hr): 0.73
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.66
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
Maximum Hourly Emission Rate (lbs/hr): 0.36
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
MAGLC (ug/m3): 23404.76

III. Monitoring and/or Record Keeping Requirements (continued)

Pollutant: methyl methacrylate

TLV (mg/m3): 410
Maximum Hourly Emission Rate (lbs/hr): 0.29
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
MAGLC (ug/m3): 9761.9

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.).

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Mixing Station #2 (P010)

Activity Description: Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #2	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. Additional Terms and Conditions

2.a The permittee shall employ a cover to reduce solvent evaporation losses.

2.b Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.

2.c Based on the "worst-case" emission scenario and using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

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

1.a Emission Limitations:

8 lbs/hr of OC
40 lbs/day of OC
7.3 tpy of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #2		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P010) 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):

Pollutant: acetone

TLV (mg/m3): 1188
Maximum Hourly Emission Rate (lbs/hr): 15.64
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240
MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.81
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 1.97
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
Maximum Hourly Emission Rate (lbs/hr): 0.73
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.66
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
Maximum Hourly Emission Rate (lbs/hr): 0.36
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
MAGLC (ug/m3): 23404.76

III. Monitoring and/or Record Keeping Requirements (continued)

Pollutant: methyl methacrylate

TLV (mg/m3): 410
Maximum Hourly Emission Rate (lbs/hr): 0.29
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
MAGLC (ug/m3): 9761.9

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.).

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Mixing Station #3 (P011)

Activity Description: Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #3	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. Additional Terms and Conditions

2.a The permittee shall employ a cover to reduce solvent evaporation losses.

2.b Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.

2.c Based on the "worst-case" emission scenario and using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

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

1.a Emission Limitations:

8 lbs/hr of OC
40 lbs/day of OC
7.3 tpy of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #3		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P011) 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):

Pollutant: acetone

TLV (mg/m3): 1188
Maximum Hourly Emission Rate (lbs/hr): 15.64
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240
MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.81
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 1.97
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
Maximum Hourly Emission Rate (lbs/hr): 0.73
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.66
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
Maximum Hourly Emission Rate (lbs/hr): 0.36
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
MAGLC (ug/m3): 23404.76

III. Monitoring and/or Record Keeping Requirements (continued)

Pollutant: methyl methacrylate

TLV (mg/m3): 410
Maximum Hourly Emission Rate (lbs/hr): 0.29
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
MAGLC (ug/m3): 9761.9

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.).

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Mixing Station #7 (P012)

Activity Description: Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #7	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. Additional Terms and Conditions

2.a The permittee shall employ a cover to reduce solvent evaporation losses.

2.b Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.

2.c Based on the "worst-case" emission scenario and using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

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

1.a Emission Limitations:

8 lbs/hr of OC
40 lbs/day of OC
7.3 tpy of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #7		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P012) 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):

Pollutant: acetone

TLV (mg/m3): 1188
Maximum Hourly Emission Rate (lbs/hr): 15.64
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240
MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.81
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 1.97
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
Maximum Hourly Emission Rate (lbs/hr): 0.73
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.66
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
Maximum Hourly Emission Rate (lbs/hr): 0.36
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
MAGLC (ug/m3): 23404.76

III. Monitoring and/or Record Keeping Requirements (continued)

Pollutant: methyl methacrylate

TLV (mg/m3): 410
Maximum Hourly Emission Rate (lbs/hr): 0.29
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
MAGLC (ug/m3): 9761.9

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.).

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Mixing Station #4 (P013)

Activity Description: Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #4	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. Additional Terms and Conditions

2.a The permittee shall employ a cover to reduce solvent evaporation losses.

2.b Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.

2.c Based on the "worst-case" emission scenario and using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

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

1.a Emission Limitations:

8 lbs/hr of OC
40 lbs/day of OC
7.3 tpy of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #4		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P013) 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):

Pollutant: acetone

TLV (mg/m3): 1188
Maximum Hourly Emission Rate (lbs/hr): 15.64
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240
MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.81
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 1.97
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
Maximum Hourly Emission Rate (lbs/hr): 0.73
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.66
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
Maximum Hourly Emission Rate (lbs/hr): 0.36
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
MAGLC (ug/m3): 23404.76

III. Monitoring and/or Record Keeping Requirements (continued)

Pollutant: methyl methacrylate

TLV (mg/m3): 410
Maximum Hourly Emission Rate (lbs/hr): 0.29
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
MAGLC (ug/m3): 9761.9

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.).

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Mixing Station #9 (P014)

Activity Description: Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #9	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. Additional Terms and Conditions

2.a The permittee shall employ a cover to reduce solvent evaporation losses.

2.b Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.

2.c Based on the "worst-case" emission scenario and using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

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

1.a Emission Limitations:

8 lbs/hr of OC
40 lbs/day of OC
7.3 tpy of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #9		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P014) 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):

Pollutant: acetone

TLV (mg/m3): 1188
Maximum Hourly Emission Rate (lbs/hr): 15.64
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240
MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.81
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 1.97
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
Maximum Hourly Emission Rate (lbs/hr): 0.73
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.66
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
Maximum Hourly Emission Rate (lbs/hr): 0.36
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
MAGLC (ug/m3): 23404.76

III. Monitoring and/or Record Keeping Requirements (continued)

Pollutant: methyl methacrylate

TLV (mg/m3): 410
Maximum Hourly Emission Rate (lbs/hr): 0.29
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
MAGLC (ug/m3): 9761.9

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.).

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Mixing Station #12 (P015)

Activity Description: Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #12	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. Additional Terms and Conditions

2.a The permittee shall employ a cover to reduce solvent evaporation losses.

2.b Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.

2.c Based on the "worst-case" emission scenario and using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

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

1.a Emission Limitations:

8 lbs/hr of OC
40 lbs/day of OC
7.3 tpy of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #12		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P015) 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):

Pollutant: acetone

TLV (mg/m3): 1188
Maximum Hourly Emission Rate (lbs/hr): 15.64
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240
MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.81
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 1.97
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
Maximum Hourly Emission Rate (lbs/hr): 0.73
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.66
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
Maximum Hourly Emission Rate (lbs/hr): 0.36
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
MAGLC (ug/m3): 23404.76

III. Monitoring and/or Record Keeping Requirements (continued)

Pollutant: methyl methacrylate

TLV (mg/m3): 410
Maximum Hourly Emission Rate (lbs/hr): 0.29
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
MAGLC (ug/m3): 9761.9

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.).

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Mixing Station #13 (P016)

Activity Description: Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #13	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. Additional Terms and Conditions

2.a The permittee shall employ a cover to reduce solvent evaporation losses.

2.b Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.

2.c Based on the "worst-case" emission scenario and using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

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

1.a Emission Limitations:

8 lbs/hr of OC
40 lbs/day of OC
7.3 tpy of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #13		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P016) 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):

Pollutant: acetone

TLV (mg/m3): 1188
Maximum Hourly Emission Rate (lbs/hr): 15.64
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240
MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.81
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 1.97
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
Maximum Hourly Emission Rate (lbs/hr): 0.73
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.66
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
Maximum Hourly Emission Rate (lbs/hr): 0.36
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
MAGLC (ug/m3): 23404.76

III. Monitoring and/or Record Keeping Requirements (continued)

Pollutant: methyl methacrylate

TLV (mg/m3): 410
Maximum Hourly Emission Rate (lbs/hr): 0.29
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
MAGLC (ug/m3): 9761.9

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.).

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Mixing Station #14 (P017)

Activity Description: Paint making equipment comprising of high speed disperser and 250 gal. capacity or less mixing vessel.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #14	OAC rule 3745-31-05(A)(3) (PTI 16-1758)	7.3 tpy of organic compounds (OC) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2). See A.I.2.a below.
	OAC rule 3745-21-07(G)(2)	8.0 lbs/hr of OC 40 lbs/day of OC See A.I.2.b below.

2. Additional Terms and Conditions

2.a The permittee shall employ a cover to reduce solvent evaporation losses.

2.b Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.

2.c Based on the "worst-case" emission scenario and using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the hourly, daily, and yearly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

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

1.a Emission Limitations:

8 lbs/hr of OC
40 lbs/day of OC
7.3 tpy of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #14		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P017) 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):

Pollutant: acetone

TLV (mg/m3): 1188
Maximum Hourly Emission Rate (lbs/hr): 15.64
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 13240
MAGLC (ug/m3): 28285.7

Pollutant: toluene

TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.81
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 642.4
MAGLC (ug/m3): 4476.19

Pollutant: methyl ethyl ketone

TLV (mg/m3): 590
Maximum Hourly Emission Rate (lbs/hr): 1.97
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1593
MAGLC (ug/m3): 14047.6

Pollutant: cyclohexane

TLV (mg/m3): 1030
Maximum Hourly Emission Rate (lbs/hr): 0.73
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 878.1
MAGLC (ug/m3): 24523.8

Pollutant: methanol

TLV (mg/m3): 262
Maximum Hourly Emission Rate (lbs/hr): 0.66
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 1083
MAGLC (ug/m3): 6238.1

Pollutant: isopropyl alcohol

TLV (mg/m3): 983
Maximum Hourly Emission Rate (lbs/hr): 0.36
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 481.2
MAGLC (ug/m3): 23404.76

III. Monitoring and/or Record Keeping Requirements (continued)

Pollutant: methyl methacrylate

TLV (mg/m3): 410
Maximum Hourly Emission Rate (lbs/hr): 0.29
Predicted 1 Hour Maximum Ground-Level Concentration (ug/m3): 336.8
MAGLC (ug/m3): 9761.9

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.).

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: T057 large mixing tank (P018)

Activity Description: New 1000 gal mising tank. PTI 16-01990

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
1000-gallon paint mixing tank	OAC rule 3745-31-05(A)(3) (PTI 16-01990)	2.3 lbs/hr of volatile organic compounds (VOC) 192.6 lbs/day of organic compounds (OC) 27.6 tpy of OC for P018, P019, and P020, combined The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) as specified below.
	OAC rule 3745-31-05(C) (PTI 16-01990)	0.27 pound of individual hazardous air pollutant (HAP) per ton of paint produced 0.60 pound of combined HAPs per ton of paint produced 3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling, 12-month summation 7.54 tons of combined HAPs per year for P018, P019, and P020, combined, as a rolling, 12-month summation See A.I.2.d and A.II.1 below.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)(2)	40.0 lbs/day of VOC The hourly emission limitation specified by this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See A.I.2.a below.

2. Additional Terms and Conditions

2.a Acetone and methylene chloride emissions are not "photochemically reactive" and, therefore, are not subject to the emission limitations specified in OAC rule 3745-21-07(G)(2).

2.b The permittee shall employ a cover during each mixing operation to reduce volatilization losses.

2.c The above hourly emission limit (established pursuant to OAC rule 3745-31-05) is based on the potential to emit for this emissions unit, as determined from permit application data and Emission Inventory Improvement Program (EIIP) emission calculation methodologies. Therefore, no record keeping, reporting, nor emission calculations are required to demonstrate compliance with this emission limit.

2.d The annual OC, individual HAP, and combined HAPs emission limitations for emissions units P018, P019, and P020, combined, are based on producing all the paint in emissions unit P020 which results in the highest allowable annual emission limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P018, P019, and P020, combined, shall not exceed 22,500 tons of paint* based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of PTI 16-01990, the permittee shall not exceed the production levels specified in the following table:

Month	Maximum Allowable Cumulative Production
1	1,875 tons
1-2	3,750 tons
1-3	5,625 tons
1-4	7,500 tons
1-5	9,375 tons
1-6	11,250 tons
1-7	13,125 tons
1-8	15,000 tons
1-9	16,875 tons
1-10	18,750 tons
1-11	20,625 tons
1-12	22,500 tons

After the first 12 calendar months of operation following the issuance of PTI 16-01990, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

* For the purpose of this permit, paint is defined as including paint, paste, and concentrates.

III. Monitoring and/or Record Keeping Requirements

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

a. the total amount of paint produced*, in tons;

b. the OC emission rate, in pounds per day (i.e., multiply (a) by 2.21 pounds of OC per ton of paint produced*); and

c. the VOC emission rate, in pounds per day (i.e., multiply (a) by 0.46 pound of VOC per ton of paint produced*).

* The pounds of OC per ton of paint produced and pounds of VOC per ton of paint produced emission factors were derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998. For the purpose of this permit, paint is defined as including paint, paste, and concentrates.

2. The permittee shall maintain records of the following information for emissions units P018, P019, and P020, combined:

a. the paint production rate, the individual HAP emission rate, and the combined HAPs emission rate for each month; and

b. beginning after the first 12 calendar months of operation following the issuance of PTI 16-01990, the rolling, 12-month summation of the paint production rates, the individual HAP emission rates, and the combined HAPs emission rates.

Also, during the first 12 calendar months of operation following the issuance of PTI 16-01990, the permittee shall record the cumulative paint production rate, individual HAP emission rate, and the combined HAPs emission rate for each calendar month.

3. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate and emission rate limitations and, for the first 12 calendar months of operation following the issuance of PTI 16-01990, all exceedances of the maximum allowable cumulative production levels.

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions from this emissions unit exceeded 40.0 pounds per day, and the actual VOC emissions for each such day.

3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the OC emissions from this emissions unit exceeded 192.6 pounds per day, and the actual OC emissions for each such day.

4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - General Term and Condition A.1.c.

5. The permittee shall also submit annual reports that specify the total organic compound, the total individual HAP, and the total combined HAPs emissions from emissions units P018, P019, and P020, combined, for the previous calendar year. These reports shall be submitted by April 15 of each year.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

2.3 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the VOC emission factor of 0.46 pound of VOC per ton of paint produced by the maximum tons of paint produced per hour (5.0 tons per hour).

The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance with the above emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

1.b Emission Limitation:

40 lbs/day of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1.

1.c Emission Limitation:

192.6 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1.

1.d Emission Limitation:

27.6 tpy of OC for P018, P019, and P020, combined

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the OC emission factor of 2.45 pounds of OC per ton of paint produced by the maximum allowable amount of paint produced per year (22,500 tons per year), and then dividing by 2000 lbs/ton.

The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

1.e Emission Limitation:

0.27 pound of individual HAP per ton of paint produced

Applicable Compliance Method:

The emission limitation is equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

V. Testing Requirements (continued)

1.f Emission Limitation:

0.60 pound of combined HAPs per ton of paint produced

Applicable Compliance Method:

The emission limitation is equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

1.g Emission Limitation:

3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the individual HAP emission limitation of 0.30 pound of individual HAP per ton of paint produced by the amount of paint produced per rolling, 12-month period, and then dividing by 2000 lbs/ton.

1.h Emission Limitation:

7.54 tons of combined HAPs per year for P018, P019, and P020, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the combined HAP emission limitation of 0.67 pound of combined HAPs per ton of paint produced by the amount of paint produced per rolling, 12-month period, and then dividing by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
1000-gallon paint mixing tank	none	See B.III below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P018) was evaluated based on the actual 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):

Pollutant: Acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 23.0*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3947

MAGLC (ug/m3): 28,267.9

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 2.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 381.1

MAGLC (ug/m3): 14,047.6

Pollutant: Dichloromethane (Methylene Chloride)

TLV (mg/m3): 174

Maximum Hourly Emission Rate (lbs/hr): 4.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 721.3

MAGLC (ug/m3): 4,142.9

* combined hourly emission rate from emissions units P018, P019, and P020.

III. Monitoring and/or Record Keeping Requirements (continued)

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.).

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: T059 large mixing tank (P019)

Activity Description: New mixing tank 1000 gal. PTI 16-01990

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
1000-gallon paint mixing tank	OAC rule 3745-31-05(A)(3) (PTI 16-01990)	2.3 lbs/hr of volatile organic compounds (VOC) 192.6 lbs/day of organic compounds (OC) 27.6 tpy of OC for P018, P019, and P020, combined The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) as specified below.
	OAC rule 3745-31-05(C) (PTI 16-01990)	0.27 pound of individual hazardous air pollutant (HAP) per ton of paint produced 0.60 pound of combined HAPs per ton of paint produced 3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling, 12-month summation 7.54 tons of combined HAPs per year for P018, P019, and P020, combined, as a rolling, 12-month summation See A.I.2.d and A.II.1 below.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)(2)	40.0 lbs/day of VOC The hourly emission limitation specified by this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See A.I.2.a below.

2. Additional Terms and Conditions

2.a Acetone and methylene chloride emissions are not "photochemically reactive" and, therefore, are not subject to the emission limitations specified in OAC rule 3745-21-07(G)(2).

2.b The permittee shall employ a cover during each mixing operation to reduce volatilization losses.

2.c The above hourly emission limit (established pursuant to OAC rule 3745-31-05) is based on the potential to emit for this emissions unit, as determined from permit application data and Emission Inventory Improvement Program (EIIP) emission calculation methodologies. Therefore, no record keeping, reporting, nor emission calculations are required to demonstrate compliance with this emission limit.

2.d The annual OC, individual HAP, and combined HAPs emission limitations for emissions units P018, P019, and P020 combined are based on producing all the paint in emissions unit P020 which results in the highest allowable annual emission limitations.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P018, P019, and P020, combined, shall not exceed 22,500 tons of paint* based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of PTI 16-01990, the permittee shall not exceed the production levels specified in the following table:

Month	Maximum Allowable Cumulative Production
1	1,875 tons
1-2	3,750 tons
1-3	5,625 tons
1-4	7,500 tons
1-5	9,375 tons
1-6	11,250 tons
1-7	13,125 tons
1-8	15,000 tons
1-9	16,875 tons
1-10	18,750 tons
1-11	20,625 tons
1-12	22,500 tons

After the first 12 calendar months of operation following the issuance of PTI 16-01990, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

* For the purpose of this permit, paint is defined as including paint, paste, and concentrates.

III. Monitoring and/or Record Keeping Requirements

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

a. the total amount of paint produced*, in tons;

b. the OC emission rate, in pounds per day (i.e., multiply (a) by 2.21 pounds of OC per ton of paint produced*); and

c. the VOC emission rate, in pounds per day (i.e., multiply (a) by 0.46 pound of VOC per ton of paint produced*).

* The pounds of OC per ton of paint produced and pounds of VOC per ton of paint produced emission factors were derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998. For the purpose of this permit, paint is defined as including paint, paste, and concentrates.

2. The permittee shall maintain records of the following information for emissions units P018, P019, and P020, combined:

a. the paint production rate, the individual HAP emission rate, and the combined HAPs emission rate for each month; and

b. beginning after the first 12 calendar months of operation following the issuance of PTI 16-01990, the rolling, 12-month summation of the paint production rates, the individual HAP emission rates, and the combined HAPs emission rates.

Also, during the first 12 calendar months of operation following the issuance of PTI 16-01990, the permittee shall record the cumulative paint production rate, individual HAP emission rate, and the combined HAPs emission rate for each calendar month.

3. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate and emission rate limitations and, for the first 12 calendar months of operation following the issuance of PTI 16-01990, all exceedances of the maximum allowable cumulative production levels.

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions from this emissions unit exceeded 40.0 pounds per day, and the actual VOC emissions for each such day.

3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the OC emissions from this emissions unit exceeded 192.6 pounds per day, and the actual OC emissions for each such day.

4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - General Term and Condition A.1.c.

5. The permittee shall also submit annual reports that specify the total organic compound, the total individual HAP, and the total combined HAPs emissions from emissions units P018, P019, and P020, combined, for the previous calendar year. These reports shall be submitted by April 15 of each year.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

2.3 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the VOC emission factor of 0.46 pound of VOC per ton of paint produced by the maximum tons of paint produced per hour (5.0 tons per hour).

The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance with the above emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A

1.b Emission Limitation:

40 lbs/day of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1.

1.c Emission Limitation:

192.6 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1.

1.d Emission Limitation:

27.6 tpy of OC for P018, P019, and P020, combined

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the OC emission factor of 2.45 pounds of OC per ton of paint produced by the maximum allowable amount of paint produced per year (22,500 tons per year), and then dividing by 2000 lbs/ton.

The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

1.e Emission Limitation:

0.27 pound of individual HAP per ton of paint produced

Applicable Compliance Method:

The emission limitation is equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

V. Testing Requirements (continued)

1.f Emission Limitation:

0.60 pound of combined HAPs per ton of paint produced

Applicable Compliance Method:

The emission limitation is equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

1.g Emission Limitation:

3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the individual HAP emission limitation of 0.30 pound of individual HAP per ton of paint produced by the amount of paint produced per rolling, 12-month period, and then dividing by 2000 lbs/ton.

1.h Emission Limitation:

7.54 tons of combined HAPs per year for P018, P019, and P020, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the combined HAP emission limitation of 0.67 pound of combined HAPs per ton of paint produced by the amount of paint produced per rolling, 12-month period, and then dividing by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
1000-gallon paint mixing tank	none	See B.III below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P019) was evaluated based on the actual 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):

Pollutant: Acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 23.0*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3947

MAGLC (ug/m3): 28,267.9

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 2.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 381.1

MAGLC (ug/m3): 14,047.6

Pollutant: Dichloromethane (Methylene Chloride)

TLV (mg/m3): 174

Maximum Hourly Emission Rate (lbs/hr): 4.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 721.3

MAGLC (ug/m3): 4,142.9

* combined hourly emission rate from emissions units P018, P019, and P020.

III. Monitoring and/or Record Keeping Requirements (continued)

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.).

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: T058 large mixing tank (P020)

Activity Description: New mixing tank 2000 gal. PTI 16-01990

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
2000-gallon paint mixing tank	OAC rule 3745-31-05(A)(3) (PTI 16-01990)	2.56 lbs/hr of volatile organic compounds (VOC) 191.3 lbs/day of organic compounds (OC) 27.6 tpy of OC for P018, P019, and P020, combined The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) as specified below.
	OAC rule 3745-31-05(C) (PTI 16-01990)	0.30 pound of individual hazardous air pollutant (HAP) per ton of paint produced 0.67 pound of combined HAPs per ton of paint produced 3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling, 12-month summation 7.54 tons of combined HAPs per year for P018, P019, and P020, combined, as a rolling, 12-month summation See A.II.1 below.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-21-07(G)(2)	40.0 lbs/day of VOC The hourly emission limitation specified by this rule is less stringent than the hourly emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See A.I.2.a below.

2. Additional Terms and Conditions

2.a Acetone and methylene chloride emissions are not "photochemically reactive" and, therefore, are not subject to the emission limitations specified in OAC rule 3745-21-07(G)(2).

2.b The permittee shall employ a cover during each mixing operation to reduce volatilization losses.

2.c The above hourly emission limit (established pursuant to OAC rule 3745-31-05) is based on the potential to emit for this emissions unit, as determined from permit application data and Emission Inventory Improvement Program (EIIP) emission calculation methodologies. Therefore, no record keeping, reporting, nor emission calculations are required to demonstrate compliance with this emission limit.

II. Operational Restrictions

1. The maximum annual production rate for emissions units P018, P019, and P020, combined, shall not exceed 22,500 tons of paint* based upon a rolling, 12-month summation of the production rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of PTI 16-01990, the permittee shall not exceed the production levels specified in the following table:

Month	Maximum Allowable Cumulative Production
1	1,875 tons
1-2	3,750 tons
1-3	5,625 tons
1-4	7,500 tons
1-5	9,375 tons
1-6	11,250 tons
1-7	13,125 tons
1-8	15,000 tons
1-9	16,875 tons
1-10	18,750 tons
1-11	20,625 tons
1-12	22,500 tons

After the first 12 calendar months of operation following the issuance of PTI 16-01990, compliance with the annual production rate limitation shall be based upon a rolling, 12-month summation of the production rates.

* For the purpose of this permit, paint is defined as including paint, paste, and concentrates.

III. Monitoring and/or Record Keeping Requirements

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

a. the total amount of paint produced*, in tons;

b. the OC emission rate, in pounds per day (i.e., multiply (a) by 2.45 pounds of OC per ton of paint produced*); and

c. the VOC emission rate, in pounds per day (i.e., multiply (a) by 0.51 pound of VOC per ton of paint produced*).

* The pounds of OC per ton of paint produced and pounds of VOC per ton of paint produced emission factors were derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998. For the purpose of this permit, paint is defined as including paint, paste, and concentrates.

2. The permittee shall maintain records of the following information for emissions units P018, P019, and P020, combined:

a. the paint production rate, the individual HAP emission rate, and the combined HAPs emission rate for each month; and

b. beginning after the first 12 calendar months of operation following the issuance of PTI 16-01990, the rolling, 12-month summation of the paint production rates, the individual HAP emission rates, and the combined HAPs emission rates.

Also, during the first 12 calendar months of operation following the issuance of PTI 16-01990, the permittee shall record the cumulative paint production rate, individual HAP emission rate, and the combined HAPs emission rate for each calendar month.

3. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month production rate and emission rate limitations and, for the first 12 calendar months of operation following the issuance of PTI 16-01990, all exceedances of the maximum allowable cumulative production levels.

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions from this emissions unit exceeded 40.0 pounds per day, and the actual VOC emissions for each such day.

3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the OC emissions from this emissions unit exceeded 191.3 pounds per day, and the actual OC emissions for each such day.

4. The deviation (excursion) reports shall be submitted in accordance with the requirements specified in Part 1 - General Term and Condition A.1.c.

5. The permittee shall also submit annual reports that specify the total organic compound, the total individual HAP, and the total combined HAPs emissions from emissions units P018, P019, and P020, combined, for the previous calendar year. These reports shall be submitted by April 15 of each year.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

2.56 lbs/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the VOC emission factor of 0.51 pound of VOC per ton of paint produced by the maximum tons of paint produced per hour (5.0 tons per hour).

The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance with the above emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

1.b Emission Limitation:

40 lbs/day of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1.

1.c Emission Limitation:

191.3 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the daily record keeping requirements specified in section A.III.1.

1.d Emission Limitation:

27.6 tpy of OC for P018, P019, and P020, combined

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the OC emission factor of 2.45 pounds of OC per ton of paint produced by the maximum allowable amount of paint produced per year (22,500 tons per year), and then dividing by 2000 lbs/ton.

The emission factor was derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

1.e Emission Limitation:

0.30 pound of individual HAP per ton of paint produced

Applicable Compliance Method:

The emission limitation is equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance with the above emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

V. Testing Requirements (continued)

1.f Emission Limitation:

0.67 pound of combined HAPs per ton of paint produced

Applicable Compliance Method:

The emission limitation is equivalent to the emission factor derived using equations 8.4-1, 8.4-2, 8.4-3, 8.4-5, 8.4-17, and 8.4-18 from EIIP Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Volume II, Chapter 8, Section 4, dated March, 1998.

If required, the permittee shall demonstrate compliance with the above emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Method 18.

1.g Emission Limitation:

3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the individual HAP emission limitation of 0.30 pound of individual HAP per ton of paint produced by the amount of paint produced per rolling, 12-month period, and then dividing by 2000 lbs/ton.

1.h Emission Limitation:

7.54 tons of combined HAPs per year for P018, P019, and P020, combined, as a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the combined HAP emission limitation of 0.67 pound of combined HAPs per ton of paint produced by the amount of paint produced per rolling, 12-month period, and then dividing by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
2000-gallon paint mixing tank	none	See B.III below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (P020) was evaluated based on the actual 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):

Pollutant: Acetone

TLV (mg/m3): 1187

Maximum Hourly Emission Rate (lbs/hr): 23.0*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3947

MAGLC (ug/m3): 28,267.9

Pollutant: Methyl Ethyl Ketone

TLV (mg/m3): 590

Maximum Hourly Emission Rate (lbs/hr): 2.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 381.1

MAGLC (ug/m3): 14,047.6

Pollutant: Dichloromethane (Methylene Chloride)

TLV (mg/m3): 174

Maximum Hourly Emission Rate (lbs/hr): 4.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 721.3

MAGLC (ug/m3): 4,142.9

* combined hourly emission rate from emissions units P018, P019, and P020.

III. Monitoring and/or Record Keeping Requirements (continued)

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.).

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Degassing Booth (P021)

Activity Description: Removal of propellant gas (propane) from scrap product paint spray cans.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
degassing booth	none	See A.I.2.a below.

2. Additional Terms and Conditions

2.a This emissions unit is not subject to OAC rule 3745-21-07(G)(2) as determined by the Ohio Supreme Court in Ashland Chem. Co. v. Jones (2001), 92 Ohio St.3.d 234.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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 - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Mixing Station #5 (P022)

Activity Description: Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #5	OAC rule 3745-21-07(G)(2)	See A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

2.a A person shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour, from any article, machine, equipment, or other contrivance for employing, applying, evaporating or drying any photochemically reactive material, or substance containing such photochemically reactive material.

2.b Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.

2.c Based on the "worst-case" emission scenario and using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the daily and hourly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

8 lbs/hr of OC
40 lbs/day of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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 - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Mixing Station #6 (P023)

Activity Description: Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #6	OAC rule 3745-21-07(G)(2)	See A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

2.a A person shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour, from any article, machine, equipment, or other contrivance for employing, applying, evaporating or drying any photochemically reactive material, or substance containing such photochemically reactive material.

2.b Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.

2.c Based on the "worst-case" emission scenario and using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the daily and hourly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

8 lbs/hr of OC
40 lbs/day of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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 - Terms and Conditions for Emissions Units

Emissions Unit ID: Paint Mixing Station #8 (P024)

Activity Description: Paint making equipment comprising of high speed disperser, 250 gal. capacity or less mixing vessel, measuring scale, and raw material metering system.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
paint mixing station #8	OAC rule 3745-21-07(G)(2)	See A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

2.a A person shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour, from any article, machine, equipment, or other contrivance for employing, applying, evaporating or drying any photochemically reactive material, or substance containing such photochemically reactive material.

2.b Note that acetone and methylene chloride have been determined to not be "photochemically reactive" and, therefore, are not included in the emission limitations established under OAC rule 3745-21-07 and OAC rule 3745-31-05.

2.c Based on the "worst-case" emission scenario and using EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4, the daily and hourly OC emission limits cannot be exceeded. Therefore, no record keeping, deviation reporting, or emissions calculations are required to demonstrate compliance with these limits.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

None

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitations:

8 lbs/hr of OC
40 lbs/day of OC

Applicable Compliance Method:

Compliance is demonstrated because the emission limitations specified above are greater than the potentials to emit for this emissions unit.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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 - Terms and Conditions for Emissions Units

Emissions Unit ID: Automatic Tank Washing Station (P025)

Activity Description: Acetone tank washer for main mixing room. Closed system.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
automatic tank washing station	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a A person shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour, from any article, machine, equipment, or other contrivance for employing, applying, evaporating or drying any photochemically reactive material, or substance containing such photochemically reactive material.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information for the automatic tank washing station:

a. the MSDS sheets for each cleanup material employed;

b. documentation as to whether or not each cleanup material is a photochemically reactive material; and

c. when a cleanup material is going to be employed in the manual tank washing station, the permittee shall determine and document, prior to employing the new cleanup material, whether or not it is a photochemically reactive material.

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each day that any photochemically reactive material (coating or cleanup material) is employed in the automatic tank washing station, the permittee shall collect and record the following information for each such day for the manual tank washing station:

a. the company identification for each cleanup material employed;

b. documentation of whether or not each cleanup material employed is a photochemically reactive material;

c. the number of gallons of each photochemically reactive cleanup material employed;

d. the organic compound content of each photochemically reactive cleanup material, in pounds per gallon;

e. the total organic compound emission rate for all photochemically reactive cleanup materials, in pounds per day, i.e., the sum of (c) x (d) for all photochemically reactive cleanup materials employed;

f. the total number of hours the emissions unit was in operation; and

g. the average hourly organic compound emission rate for all photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

3. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

a. an identification of each day during which the average hourly OC emissions from the photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day; and

b. an identification of each day during which the OC emissions from the photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day.

2. The deviation reports shall be submitted in accordance with the record keeping requirements specified in Part I - General Term and Condition A.1.c.

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 method:

1.a Emission Limitations:

8.0 lbs/hr of organic compounds (OC)
40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data shall be used to determine the organic compound contents of the photochemically reactive cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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 - Terms and Conditions for Emissions Units

Emissions Unit ID: Manual Tank Washing Station (P026)

Activity Description: Manual tank washing station for main mixing room

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
manual tank washing station	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a A person shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour, from any article, machine, equipment, or other contrivance for employing, applying, evaporating or drying any photochemically reactive material, or substance containing such photochemically reactive material.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information for the manual tank washing station:

a. the MSDS sheets for each cleanup material employed;

b. documentation as to whether or not each cleanup material is a photochemically reactive material; and

c. when a cleanup material is going to be employed in the manual tank washing station, the permittee shall determine and document, prior to employing the new cleanup material, whether or not it is a photochemically reactive material.

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each day that any photochemically reactive material (coating or cleanup material) is employed in the manual tank washing station, the permittee shall collect and record the following information for each such day for the manual tank washing station:

a. the company identification for each cleanup material employed;

b. documentation of whether or not each cleanup material employed is a photochemically reactive material;

c. the number of gallons of each photochemically reactive cleanup material employed;

d. the organic compound content of each photochemically reactive cleanup material, in pounds per gallon;

e. the total organic compound emission rate for all photochemically reactive cleanup materials, in pounds per day, i.e., the sum of (c) x (d) for all photochemically reactive cleanup materials employed;

f. the total number of hours the emissions unit was in operation; and

g. the average hourly organic compound emission rate for all photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

3. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

a. an identification of each day during which the average hourly OC emissions from the photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day; and

b. an identification of each day during which the OC emissions from the photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day.

2. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

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 method:

1.a Emission Limitations:

8.0 lbs/hr of organic compounds (OC)
40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data shall be used to determine the OC contents of the photochemically reactive cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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 - Terms and Conditions for Emissions Units

Emissions Unit ID: Spray Booth #6 (R003)

Activity Description: Painting of Fleckstone plastic caps for spray paint product cans.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #6	OAC rule 3745-31-05(A)(3) (PTI 16-01940)	256.0 lbs/day of volatile organic compounds (VOC) for coatings 98.4 lbs/day of acetone for coatings 18.0 tpy of acetone for coatings 2.41 tpy of particulate emissions The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(1), and 3745-21-07(G)(2).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(C) (PTI 16-01940)	The maximum annual fleckstone coating usage, clear coat coating usage, and cleanup material usage in this emissions unit shall not exceed 9210 gallons, 1000 gallons, and 640 gallons, respectively, based upon a rolling, 12-month summation of the coating and cleanup material usage figures. The VOC content of each fleckstone coating, each clear coat coating, and each cleanup material shall not exceed 2.95 pounds of VOC per gallon of coating, 3.45 pounds of VOC per gallon of coating, and 6.26 pounds of VOC per gallon of cleanup material, respectively. 17.31 tons of VOC per rolling, 12-month period for coatings and cleanup materials See A.II.1 below.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	0.551 lb/hr of particulate emissions
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.

2.b There is an increase of 1.56 tons per year in the allowable annual emissions for VOC.

2.c Note that acetone has been determined to not be "photochemically reactive" and, therefore, is not subject to the emission limitations established in OAC rule 3745-21-07 and pursuant to OAC rule 3745-31-05(D).

II. Operational Restrictions

1. The maximum annual fleckstone coating usage, clear coat coating usage, and cleanup material usage in this emissions unit shall not exceed 9210 gallons, 1000 gallons, and 640 gallons, respectively, based upon a rolling, 12-month summation of the usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall not exceed the usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Fleckstone Coating Usage	Maximum Allowable Cumulative Clear Coat Coating Usage	Maximum Allowable Cumulative Cleanup Material Usage
1	1315.7 gallons	142.9 gallons	91.4 gallons
1-2	2631.4 gallons	285.7 gallons	182.9 gallons
1-3	3947.1 gallons	428.6 gallons	274.3 gallons
1-4	5262.9 gallons	571.4 gallons	365.7 gallons
1-5	6578.6 gallons	714.3 gallons	457.1 gallons
1-6	7894.3 gallons	857.1 gallons	548.6 gallons
1-7	9210.0 gallons	1000.0 gallons	640.0 gallons
1-8	9210.0 gallons	1000.0 gallons	640.0 gallons
1-9	9210.0 gallons	1000.0 gallons	640.0 gallons
1-10	9210.0 gallons	1000.0 gallons	640.0 gallons
1-11	9210.0 gallons	1000.0 gallons	640.0 gallons
1-12	9210.0 gallons	1000.0 gallons	640.0 gallons

After the first 12 calendar months of operation following the issuance of permit to install 16-01940, compliance with the annual usage limitations shall be based upon a rolling, 12-month summation of the usage figures.

2. The permittee shall operate a double frame filter for the control of particulate emissions when this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information for this emissions unit:

a. the MSDS sheets for each coating and cleanup material employed;

b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and

c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document, prior to employing the new coating or cleanup material, whether or not it is a photochemically reactive material.

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each day that any photochemically reactive material (coating or cleanup material) is employed in the coating line, the permittee shall collect and record the following information for each such day for this emissions unit:

a. the company identification for each coating and cleanup material employed;

b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material;

c. the number of gallons of each coating and photochemically reactive cleanup material employed;

d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

e. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

f. the total number of hours the emissions unit was in operation; and

g. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material, in pounds per gallon;

d. the total VOC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, then divided by 2000 lbs/ton);

e. the total VOC emissions from all coatings, in tons (i.e., the sum of the daily VOC emissions in A.III.5.e for each month, then divided by 2000 lbs/ton);

f. the total VOC emissions from all coatings and cleanup materials employed, in tons (i.e., (d) plus (e)); and

g. beginning after the first 12 calendar months of operation following the issuance of permit to install 16-01940, the rolling, 12-month summation of the VOC emission figures.

Also, during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall record the cumulative VOC emissions for each calendar month.

4. The permittee shall maintain monthly records of the following information:

a. the fleckstone coating usage, the clear coat coating usage, and the cleanup material usage for each month

b. the VOC content of each fleckstone coating, each clear coat coating, and each cleanup material, in pounds per gallon; and

c. beginning after the first 12 calendar months of operation following the issuance of permit to install 16-01940, the rolling, 12-month summation of the usage figures.

Also, during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall record the cumulative usage for each calendar month.

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. the name and identification number of each coating employed;

b. the VOC content of each coating, in pounds per gallon;

c. the acetone content of each coating, in pounds per gallon;

d. the volume, in gallons, of each coating employed;

e. the total VOC emission rate for all coatings, in pounds per day (i.e., the sum of (b) times (d) for each coating); and

f. the total acetone emission rate for all coatings, in pounds per day (i.e., the sum of (c) times (d) for each coating).

6. The permittee shall document whether or not the double frame filter was in service when the emissions unit was in operation.

7. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. for the days during which any photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day; and

b. for the days during which a photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the VOC emissions exceeded 17.31 tons as a rolling, 12-month average, the actual VOC emissions, in tons, during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative VOC emission levels.

3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. an identification of each month during which the fleckstone coating usage exceeded 9210 gallons as a rolling, 12-month average, the actual fleckstone coating usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative fleckstone coating usage levels;

b. an identification of each month during which the clear coat coating usage exceeded 1000 gallons as a rolling, 12-month average, the actual clear coat coating usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative clear coat coating usage levels; and

c. an identification of each month during which the cleanup material usage exceeded 640 gallons as a rolling, 12-month average, the actual cleanup material usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative cleanup material usage levels.

IV. Reporting Requirements (continued)

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a fleckstone coating, a clear coat coating, and/or a cleanup material that exceeds the VOC content limitations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.

5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the double frame filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Direct (the appropriate District Office or local air agency) within 30 days after the event occurs.

6. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the VOC emissions from coatings exceeded 256.0 lbs/day, and the actual daily VOC emissions for each such day.

7. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the acetone emissions from coatings exceeded 98.4 lbs/day, and the actual daily acetone emissions for each such day.

8. The permittee shall also submit annual reports that specify the total VOC and the total acetone emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

9. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

8.0 lbs/hr of organic compounds (OC)
40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and photochemically reactive cleanup materials.

1.b Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures required in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

1.c Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

E = maximum coating solids usage rate in pounds per hour x (1-TE) x (1-CE)

E = particulate emissions rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

If required, compliance shall also be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

1.d Emission Limitation:

17.31 tons of VOC per rolling, 12-month period for coatings and cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.3 and A.III.5. Formulation data shall be used to determine the VOC content of each cleanup material. Formulation data or US EPA Method 24 shall be used to determine the VOC content for each coating.

1.e Emission Limitation:

256.0 lbs/day of VOC for coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.5. Formulation data or US EPA Method 24 shall be used to determine the VOC content for each coating.

1.f Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

E = [maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE) x 8760]/2000

E = particulate emissions rate (tons per year)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment =0.90

V. Testing Requirements (continued)

1.g Emission Limitation:

98.4 lbs/day of acetone for coatings

Applicable Compliance Method

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.5. Formulation data shall be used to determine the acetone content for each coating.

1.h Emission Limitation:

18.0 tpy of acetone for coatings

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the daily allowable emission rate for acetone by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #6 (Modification).		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (R003) 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):

Pollutant: acetone

TLV (mg/m3): 1187
Maximum Hourly Emission Rate (lbs/hr): 45.0*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9624
MAGLC (ug/m3): 28261.9

*combined emission rates for R003, R004, and R006

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:

III. Monitoring and/or Record Keeping Requirements (continued)

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.).

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Spray Booth #1 (R004)

Activity Description: Automatic loading and painting of plastic caps for spray paint product cans.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #1	OAC rule 3745-31-05(A)(3) (PTI 16-01940)	117.0 lbs/day of volatile organic compounds (VOC) for coatings 252.0 lbs/day of acetone for coatings 50.0 tpy of acetone for coatings and cleanup materials 2.41 tpy of particulate emissions The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(1), and 3745-21-07(G)(2).
	OAC rule 3745-31-05(C) (PTI 16-01940)	The maximum annual car color coating usage and red spot primer coating usage in this emissions unit shall not exceed 2900 gallons and 3100 gallons, respectively, based upon a rolling, 12-month summation of the coating usage figures. The VOC content of each car color coating and each red spot primer shall not exceed 2.91 pounds of VOC per gallon of coating and 0.98 pound of VOC per gallon of coating, respectively. 5.74 tons of VOC per rolling, 12-month period for coatings See A.II.1 below.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	0.551 lb/hr of particulate emissions
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.

2.b There is an increase of 0.94 ton per year in the allowable annual emissions for VOC.

2.c Note that acetone has been determined to not be "photochemically reactive" and, therefore, is not subject to the emission limitations established in OAC rule 3745-21-07 and pursuant to OAC rule 3745-31-05(D).

II. Operational Restrictions

1. The maximum annual car color coating usage and red spot primer coating usage in this emissions unit shall not exceed 2900 gallons and 3100 gallons, respectively, based upon a rolling, 12-month summation of the coating usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Car Color Coating Usage	Maximum Allowable Cumulative Red Spot Primer Coating Usage
1	414.3 gallons	442.9 gallons
1-2	828.6 gallons	885.7 gallons
1-3	1242.9 gallons	1328.6 gallons
1-4	1657.1 gallons	1771.4 gallons
1-5	2071.4 gallons	2214.3 gallons
1-6	2485.7 gallons	2657.1gallons
1-7	2900.0 gallons	3100.0 gallons
1-8	2900.0 gallons	3100.0 gallons
1-9	2900.0 gallons	3100.0 gallons
1-10	2900.0 gallons	3100.0 gallons
1-11	2900.0 gallons	3100.0 gallons
1-12	2900.0 gallons	3100.0 gallons

After the first 12 calendar months of operation following the issuance of permit to install 16-01940, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating usage figures.

2. The permittee shall only employ cleanup materials that do not contain any VOC, as defined in OAC rule 3745-21-01(B)(6).

3. The permittee shall operate a double frame filter for the control of particulate emissions when this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information for this emissions unit:

a. the MSDS sheets for each coating and cleanup material employed;

b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and

c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document, prior to employing the new coating or cleanup material, whether or not it is a photochemically reactive material.

2. For each day that any photochemically reactive material (coating or cleanup material) is employed in the coating line, the permittee shall collect and record the following information for each such day for this emissions unit:

a. the company identification for each coating and cleanup material employed;

b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material;

c. the number of gallons of each coating and photochemically reactive cleanup material employed;

d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

e. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

f. the total number of hours the emissions unit was in operation; and

g. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information for this emissions unit:

a. the name and identification of each cleanup material employed; and

b. documentation as to whether or not each cleanup material contains any VOC.

4. The permittee shall collect and record the following information each month for this emissions unit:

a. the total VOC emissions from all coatings, in tons (i.e., the sum of the daily VOC emissions in A.III.6.e for each month, divided by 2000 lbs/ton); and

b. beginning after the first 12 calendar months of operation following the issuance of permit to install 16-01940, the rolling, 12-month summation of the VOC emission figures.

Also, during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall record the cumulative VOC emissions for each calendar month.

III. Monitoring and/or Record Keeping Requirements (continued)

5. The permittee shall maintain monthly records of the following information:

a. the car color coating usage and the red spot primer coating usage for each month;

b. the VOC content of each car color coating and each red spot primer coating, in pounds per gallon; and

c. beginning after the first 12 calendar months of operation following the issuance of permit to install 16-01940, the rolling, 12-month summation of the coating usage figures.

Also, during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall record the cumulative coating usage for each calendar month.

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

a. the name and identification number of each coating employed;

b. the VOC content of each coating, in pounds per gallon;

c. the acetone content of each coating, in pounds per gallon;

d. the volume, in gallons, of each coating employed;

e. the total VOC emission rate for all coatings, in pounds per day (i.e., the sum of (b) times (d) for each coating); and

f. the total acetone emission rate for all coatings, in pounds per day (i.e., the sum of (c) times (d) for each coating).

7. The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each cleanup material employed;

b. the acetone content of each cleanup material, in pounds per gallon;

c. the volume, in gallons, of each cleanup material employed;

d. the acetone emission rate for all coatings, in tons per month (i.e., the sum of the daily acetone emissions in section A.III.6.f above for each month, divided by 2000 lbs/ton);

e. the acetone emission rate for all cleanup materials, in tons per month (i.e., the sum of (b) times (c) for each cleanup material, divided by 2000 lbs/ton); and

f. the total acetone emission rate for all cleanup materials and coatings, in tons per month (i.e., (d) plus (e)).

8. The permittee shall document whether or not the double frame filter was in service when the emissions unit was in operation.

9. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. for the days during which any photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day; and

b. for the days during which a photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the VOC emissions exceeded 5.74 tons as a rolling, 12-month average, the actual VOC emissions, in tons, during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative VOC emission levels.

3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. an identification of each month during which the car color coating usage exceeded 2900 gallons as a rolling, 12-month average, the actual car color coating usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative coating usage levels; and

b. an identification of each month during which the red spot primer coating usage exceeded 3100 gallons as a rolling, 12-month average, the actual red spot primer coating usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative coating usage levels.

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing if a cleanup material containing VOC (as defined in OAC rule 3745-21-01(B)(6)) is employed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.

5. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a car color coating and/or a red spot primer coating that exceeds the VOC content limitations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.

6. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the double frame filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Direct (the appropriate District Office or local air agency) within 30 days after the event occurs.

7. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the VOC emissions from coatings exceeded 117.0 lbs/day, and the actual daily VOC emissions for each such day.

8. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the acetone emissions from coatings exceeded 252.0 lbs/day, and the actual daily acetone emissions for each such day.

9. The permittee shall also submit annual reports that specify the total VOC and the total acetone emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

10. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitations:

8.0 lbs/hr of organic compounds (OC)
40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and photochemically reactive cleanup materials.

1.b Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures required in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

1.c Emission Limitation

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

E = maximum coating solids usage rate in pounds per hour x (1-TE) x (1-CE)

E = particulate emissions rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

If required, compliance shall also be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

1.d Emission Limitation:

5.74 tons of VOC per rolling, 12-month period for coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.4 and A.III.6. Formulation data or US EPA Method 24 shall be used to determine the VOC content for each coating.

V. Testing Requirements (continued)

1.e Emission Limitation:

117.0 lbs/day of VOC for coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.6. Formulation data or US EPA Method 24 shall be used to determine the VOC content for each coating.

1.f Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

E = [maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE) x 8760]/2000

E = particulate emissions rate (tons per year)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

1.g Emission Limitation:

252.0 lbs/day of acetone for coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.6. Formulation data shall be used to determine the acetone content for each coating.

1.h Emission Limitation:

50.0 tpy of acetone for coatings and cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.6 and A.III.7. Formulation data shall be used to determine the acetone content for each coating and cleanup material.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #1		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (R004) 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):

Pollutant: acetone

TLV (mg/m3): 1187
Maximum Hourly Emission Rate (lbs/hr): 45.0*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9624
MAGLC (ug/m3): 28261.9

*combined emission rates for R003, R004, and R006

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:

III. Monitoring and/or Record Keeping Requirements (continued)

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.).

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Spray Booth #5 (R005)

Activity Description: Painting of scratch color plastic caps for spray paint product cans.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
surface coating of plastic caps - paint spray booth #5	OAC rule 3745-31-05 (PTI 16-1332)	26.0 lbs/day of total organic compounds (OC), excluding cleanup emissions See A.I.2.a below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(1), and 3745-21-07(G)(2).
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	0.551 lb/hr of particulate emissions
	OAC rule 3745-21-07(G)(2)	See A.I.2.b below.

2. Additional Terms and Conditions

2.a This emissions unit shall employ a high volume, low pressure (HV LP) spray gun.

2.b A person shall not discharge more than forty pounds of organic material into the atmosphere in any one day, nor more than eight pounds in any one hour, from any article, machine, equipment, or other contrivance for employing, applying, evaporating or drying any photochemically reactive material, or substance containing photochemically reactive material.

II. Operational Restrictions

1. The permittee shall use no more than 5.0 gallons of coating per day in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day that any photochemically reactive material (coating or cleanup material) is employed in the coating line, the permittee shall collect and record the following information for each such day for this emissions unit:

a. the company identification for each coating and photochemically reactive cleanup material employed;

b. the number of gallons of each coating and photochemically reactive cleanup material employed;

c. the organic compound (OC) content of each coating and photochemically reactive cleanup material, in pounds per gallon;

d. the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

e. the total number of hours the emissions unit was in operation; and

f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

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

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

a. the company identification for each coating;

b. the number of gallons of each coating;

c. the OC content of each coating, in pounds per gallon;

d. the total OC emission rate for all coatings, in pounds per day; and

e. the total number of gallons of all coatings employed.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

3. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. for the days during which any photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day; and

b. for the days during which a photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day.

IV. Reporting Requirements (continued)

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

a. an identification of each day during which the total OC emissions exceeded 26.0 lbs/day, and the actual OC emissions for each such day; and

b. an identification of each day during which the coating line employed more than the applicable maximum daily coating usage limit.

3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

8.0 lbs/hr of OC
40.0 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials.

1.b Emission Limitation:

26.0 lbs/day of total OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings.

1.c Operational Restriction:

5.0 gallons of coating per day

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2.

1.d Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures required in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

1.e Emission Limitation

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

E = maximum coating solids usage rate in pounds per hour x (1-TE) x (1-CE)

E = particulate emissions rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

If required, compliance shall also be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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 - Terms and Conditions for Emissions Units

Emissions Unit ID: Spray Booth #7 (R006)

Activity Description: Painting of Fleckstone plastic caps for spray paint product cans.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #6	OAC rule 3745-31-05(A)(3) (PTI 16-01940)	256.0 lbs/day of volatile organic compounds (VOC) for coatings 98.4 lbs/day of acetone for coatings 18.0 tpy of acetone for coatings 2.41 tpy of particulate emissions The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11(B)(1), and 3745-21-07(G)(2).

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(C) (PTI 16-01940)	The maximum annual fleckstone coating usage, clear coat coating usage, and cleanup material usage in this emissions unit shall not exceed 9210 gallons, 1000 gallons, and 640 gallons, respectively, based upon a rolling, 12-month summation of the coating and cleanup material usage figures. The VOC content of each fleckstone coating, each clear coat coating, and each cleanup material shall not exceed 2.95 pounds of VOC per gallon of coating, 3.45 pounds of VOC per gallon of coating, and 6.26 pounds of VOC per gallon of cleanup material, respectively. 17.31 tons of VOC per rolling, 12-month period for coatings and cleanup materials See A.II.1 below.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	0.551 lb/hr of particulate emissions
	OAC rule 3745-21-07(G)(2)	See A.I.2.a below.

2. Additional Terms and Conditions

2.a When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.

2.b There is an increase of 1.56 tons per year in the allowable annual emissions for VOC.

2.c Note that acetone has been determined to not be "photochemically reactive" and, therefore, is not subject to the emission limitations established in OAC rule 3745-21-07 and pursuant to OAC rule 3745-31-05(D).

II. Operational Restrictions

1. The maximum annual fleckstone coating usage, clear coat coating usage, and cleanup material usage in this emissions unit shall not exceed 9210 gallons, 1000 gallons, and 640 gallons, respectively, based upon a rolling, 12-month summation of the usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall not exceed the usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Fleckstone Coating Usage	Maximum Allowable Cumulative Clear Coat Coating Usage	Maximum Allowable Cumulative Cleanup Material Usage
1	1315.7 gallons	142.9 gallons	91.4 gallons
1-2	2631.4 gallons	285.7 gallons	182.9 gallons
1-3	3947.1 gallons	428.6 gallons	274.3 gallons
1-4	5262.9 gallons	571.4 gallons	365.7 gallons
1-5	6578.6 gallons	714.3 gallons	457.1 gallons
1-6	7894.3 gallons	857.1 gallons	548.6 gallons
1-7	9210.0 gallons	1000.0 gallons	640.0 gallons
1-8	9210.0 gallons	1000.0 gallons	640.0 gallons
1-9	9210.0 gallons	1000.0 gallons	640.0 gallons
1-10	9210.0 gallons	1000.0 gallons	640.0 gallons
1-11	9210.0 gallons	1000.0 gallons	640.0 gallons
1-12	9210.0 gallons	1000.0 gallons	640.0 gallons

After the first 12 calendar months of operation following the issuance of permit to install 16-01940, compliance with the annual usage limitations shall be based upon a rolling, 12-month summation of the usage figures.

2. The permittee shall operate a double frame filter for the control of particulate emissions when this emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the following information for this emissions unit:

a. the MSDS sheets for each coating and cleanup material employed;

b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material; and

c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document, prior to employing the new coating or cleanup material, whether or not it is a photochemically reactive material.

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each day that any photochemically reactive material (coating or cleanup material) is employed in the coating line, the permittee shall collect and record the following information for each such day for this emissions unit:

a. the company identification for each coating and cleanup material employed;

b. documentation of whether or not each coating and cleanup material employed is a photochemically reactive material;

c. the number of gallons of each coating and photochemically reactive cleanup material employed;

d. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;

e. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

f. the total number of hours the emissions unit was in operation; and

g. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (e)/(f), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the VOC content of each cleanup material, in pounds per gallon;

d. the total VOC emissions from all cleanup materials employed, in tons (i.e., the sum of (b) times (c) for each cleanup material, divided by 2000 lbs/ton);

e. the total VOC emissions from all coatings, in tons (i.e., the sum of the daily VOC emissions in A.III.5.e for each month, divided by 2000 lbs/ton);

f. the total VOC emissions from all coatings and cleanup materials employed, in tons (i.e., (d) plus (e)); and

g. beginning after the first 12 calendar months of operation following the issuance of permit to install 16-01940, the rolling, 12-month summation of the VOC emission figures.

Also, during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall record the cumulative VOC emissions for each calendar month.

4. The permittee shall maintain monthly records of the following information:

a. the fleckstone coating usage, the clear coat coating usage, and the cleanup material usage for each month

b. the VOC content of each fleckstone coating, each clear coat coating, and each cleanup material, in pounds per gallon; and

c. beginning after the first 12 calendar months of operation following the issuance of permit to install 16-01940, the rolling, 12-month summation of the usage figures.

Also, during the first 12 calendar months of operation following the issuance of permit to install 16-01940, the permittee shall record the cumulative usage for each calendar month.

III. Monitoring and/or Record Keeping Requirements (continued)

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

a. the name and identification number of each coating employed;

b. the VOC content of each coating, in pounds per gallon;

c. the acetone content of each coating, in pounds per gallon;

d. the volume, in gallons, of each coating employed;

e. the total VOC emission rate for all coatings, in pounds per day (i.e., the sum of (b) times (d) for each coating); and

f. the total acetone emission rate for all coatings, in pounds per day (i.e., the sum of (c) times (d) for each coating).

6. The permittee shall document whether or not the double frame filter was in service when the emissions unit was in operation.

7. This emissions unit is subject to record keeping requirements in Part II - Specific Facility Terms and Conditions of this permit to show compliance with the facility-wide emission limitations for volatile organic compounds, individual HAP, and total combined HAPs.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. for the days during which any photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly OC emissions for each such day; and

b. for the days during which a photochemically reactive material (coating or cleanup material) was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 lbs/day, and the actual OC emissions for each such day.

2. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each month during which the VOC emissions exceeded 17.31 tons as a rolling, 12-month average, the actual VOC emissions, in tons, during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative VOC emission levels.

3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. an identification of each month during which the fleckstone coating usage exceeded 9210 gallons as a rolling, 12-month average, the actual fleckstone coating usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative fleckstone coating usage levels;

b. an identification of each month during which the clear coat coating usage exceeded 1000 gallons as a rolling, 12-month average, the actual clear coat coating usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative clear coat coating usage levels; and

c. an identification of each month during which the cleanup material usage exceeded 640 gallons as a rolling, 12-month average, the actual cleanup material usage during each such month and, for the first 12 calendar months of operation following the issuance of permit to install 16-01940, all exceedances of the maximum allowable cumulative cleanup material usage levels.

IV. Reporting Requirements (continued)

4. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of a fleckstone coating, a clear coat coating, and/or a cleanup material that exceeds the VOC content limitations. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after such an occurrence.

5. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any record showing that the double frame filter was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Direct (the appropriate District Office or local air agency) within 30 days after the event occurs.

6. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the VOC emissions from coatings exceeded 256.0 lbs/day, and the actual daily VOC emissions for each such day.

7. The permittee shall submit quarterly deviation (excursion) reports that include an identification of each day during which the acetone emissions from coatings exceeded 98.4 lbs/day, and the actual daily acetone emissions for each such day.

8. The permittee shall also submit annual reports that specify the total VOC and the total acetone emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

9. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c.

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

8.0 lbs/hr of organic compounds (OC)
40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and photochemically reactive cleanup materials.

1.b Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the procedures required in 40 CFR Part 60, Appendix A, Method 9 and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

1.c Emission Limitation:

0.551 lb/hr of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation may be used:

E = maximum coating solids usage rate in pounds per hour x (1-TE) x (1-CE)

E = particulate emissions rate (pounds per hour)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment = 0.90

If required, compliance shall also be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

1.d Emission Limitation:

17.31 tons of VOC per rolling, 12-month period for coatings and cleanup materials

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in sections A.III.3 and A.III.5. Formulation data shall be used to determine the VOC content of each cleanup material. Formulation data or US EPA Method 24 shall be used to determine the VOC content for each coating.

1.e Emission Limitation:

256.0 lbs/day of VOC for coatings

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.5. Formulation data or US EPA Method 24 shall be used to determine the VOC content for each coating.

1.f Emission Limitation:

2.41 tpy of particulate emissions

Applicable Compliance Method:

To determine the actual worst case particulate emissions rate, the following equation shall be used:

E = [maximum coating solids usage rate in pounds per hour X (1-TE) X (1-CE) x 8760]/2000

E = particulate emissions rate (tons per year)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used = 0.75

CE = fractional control efficiency of the control equipment =0.90

V. Testing Requirements (continued)

1.g Emission Limitation:

98.4 lbs/day of acetone for coatings

Applicable Compliance Method

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.5. Formulation data shall be used to determine the acetone content for each coating.

1.h Emission Limitation:

18.0 tpy of acetone for coatings

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the daily allowable emission rate for acetone by the actual annual hours of operation, and then dividing by 2000 lbs/ton.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Binks HVLP spray gun, spray booth - heat lamp drying chamber - surface coating line for plastic caps - spray booth #7 (Modification).		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit (R006) 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):

Pollutant: acetone

TLV (mg/m3): 1187
Maximum Hourly Emission Rate (lbs/hr): 45.0*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9624
MAGLC (ug/m3): 28261.9

*combined emission rates for R003, R004, and R006

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:

III. Monitoring and/or Record Keeping Requirements (continued)

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.).

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.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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THIS IS THE LAST PAGE OF THE PERMIT

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Statement of Basis For Title V Permit

Part I - General		
Company Name	Plasti-Kote Co., Inc.	
Premise Number	1652050060	
What makes this facility a Title V facility?		Volatile Organic Compounds
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?		Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.		No

Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	In Part II - Specific Facility Term and Condition A.1, fixed a typographical error in a citation of the Plastic Parts MACT (should have been subpart PPPP instead of subpart PPP). Also, updated the Z0XX identification to the appropriate P0XX or R0XX designations based on PTI 16-02334, added new emissions units (P045 and P046) from PTI 16-02415 and PTI 16-02417, and added emissions units Z073 and Z074 to be included in the facility-wide emission limitations for VOC, individual HAP, and combined HAPs. Specific Facility Term and Condition A.3.i was updated with the new emissions units (P045 and P046) and missed emissions units (Z073 and Z074) potentials to emit. Also, Z0XX sources that were given P0XX or R0XX in PTI 16-02334 were updated along with their potential to emit limitations that were set in PTI 16-02334. Storage tanks T004, T006, T007, T011, T012, T013, T022, T023, and T024 potentials to emit were updated to allow for HAP emissions. Also, the operational restriction stating that the tanks can not store any material which contains any HAPs and the corresponding reporting requirement was removed. Updated the totals for the potentials to emit for VOC, individual HAP, and combined HAPs and updated the amount that is to be added each month to monthly VOC, individual HAP, and combined HAPs. Specific Facility Term and Condition A.3.c was changed to add record keeping for any individual HAP and combined HAP for P007. Specific Facility Term and Condition A.3.j was updated with the new numbers to add to the total VOC, individual HAP, and combined HAPs emission rates for the insignificant emissions units and to add in the emissions of individual HAP and combined HAPs from emissions unit P007 under A.3.c. Specific Facility Term and Condition A.8 was removed. This was an error on my part for putting in this requirement of no HAP being employed in emissions unit P007. Specific Facility Term and Condition A.9 was added which is the updated insignificant emissions units language. P045, P046, Z073, and Z074 were added to this list. The PTI number was added to any insignificant emissions unit with a PTI. Z0XX emission designations were changed to the appropriate P0XX or R0XX designation from the PTI. Part III -Terms and Conditions for Emissions Unit K003 were updated to PTI 16-02317. This PTI added additional emissions limitations and coating usage restrictions. Part III - Terms and Conditions for Emissions Unit K002 a paragraph was missing from section A.II.1 at the end of the table for the cumulative coating usage limitations. This paragraph was added. Part III - Terms and Conditions for Emissions Units K002, K003, P018, P019, P020, R003, R004, and R006 the OAC rule 3745-31-05(D) for placing restrictions in the PTI was changed in the rules to OAC rule 3745-31-05(C). This citation was changed in the above-mention emissions units to reflect the new citation of OAC rule 3745-31-05(C).

Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1 and A.2	77-07(A)(1)	N	These paragraphs establish federally enforceable facility limitations on VOC, individual HAP, and total combined HAPs in order to avoid being classified as major for PSD and to avoid being classified as a major source for hazardous air pollutants for the upcoming Miscellaneous Organic Chemical Production and Processes MACT standard, 40 CFR Part 63, subpart FFFF and Plastic Parts (surface coating) MACT standard, 40 CFR Part 63, Subpart PPPP.
A.3, A.3.a, A.3.b, A.3.c, A.3.d, A.3.e, A.3.f, A.3.g, A.3.h, A.3.i, and A.3.j	77-07(C)(1)	N	These paragraphs establish the record keeping for determining the VOC, individual HAP, and total combined HAPs emissions from the facility to verify compliance with the facility emission limitations in paragraph A. 2. Paragraph A.3.i establishes the potential to emit for VOC, individual HAP, and combined HAPs for the insignificant emissions units.
A.4 and A.5	77-07(C)(1)	N	These paragraphs establish the reporting requirements for the facility emission limitations in paragraph A. 2.

A.6 and A.6.a	77-07(C)(1)	N	These paragraphs show the applicable compliance methods for the facility emission limitations.
A.7	77-07(A)(1) and (C)(1)	N	This paragraph is an operational restriction for the paint filling lines (P002 - P006) and the rework gasser (Z002). This paragraph states that the aerosol paint cans can not be gas with a material that contains any HAPs and that the permittee should maintain documentation to prove the gas contains no HAPs.
A.8	77-07(A)(1) and (C)(1)	N	This paragraph is an operational restriction for emissions unit P007. This paragraph states that P007 can not employ any materials that contain any of the HAPs and must maintain documentation to prove the materials employed do not contain any HAPs.
A.9	77-07(A)(1) and (C)(1)	N	This paragraph is an operational restriction for emissions unit T005. This paragraph states that T005 shall only store acetone in this storage tank.
A.10	77-07(A)(13)	N	List of insignificant emissions units that are subject to an emission limitation in a Permit to Install or subject to federally approved versions of OAC chapters 3745-17, 3745-18, and/or 3745-21.

C **Instructions for Part II:**

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an “N” in the column under “SIP.” If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a “Y” should be noted in the “Other” column, and if not, an “N” should be noted. Whether the basis for the term and condition is the “SIP” or “Other,” an explanation of each term and condition in Part II must be provided in the “Comments” section.

Part III (Requirements Within the State and Federally Enforceable Section)

Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	O R	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												

K001, K002, K003, P022, P023, P024, P025, P026, R003, R004, R005, and R006	8.0 lbs/hr and 40 lbs/day of Organic Material when employing, applying, evaporating, or drying a photo-chemically reactive material*	21-07(G)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance with limitations is determined through record keeping of coating usage and photochemically reactive cleanup material usage, OC content of each coating and photochemically reactive cleanup material, and operating time.
K002 and R004	117.0 lbs/day VOC *	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance with limitation is determined through records of daily coating usage and of each coating's VOC content.
K002 and R004	252.0 lbs/day of acetone for coatings*	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance with the limitation is determined through records of the daily coating usage and each coating's acetone content.
K002 and R004	50.0 tpy of acetone for coatings and cleanup material*	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance with the limitation is determined through monthly records of cleanup material usage and each cleanup material's acetone content and daily records of the coating usage and each coating's acetone content.
K002, R003, R004, R005, and R006	0.551 lb/hr of particulates*	17-11	N	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, and ET - Compliance is determined through a calculation using the "worst-case" coating for solids.
K002, R003, R004, and R006	2.41 tpy of particulates*	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05(A)(3) M, R, Rp, and ET - Compliance is determined through a calculation using the "worst-case" coating for solids.

K002, R003, R004, R005, and R006	20% opacity, as six-minute average	17-07(A)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR - Permittee is required to operate a double frame filter when this emissions unit is in operation. ET - Monitoring/record keeping to ensure filter is use will ensure compliance with this limitation.
K002	The maximum annual car color coating usage and red spot primer coating usage for this emissions unit shall not exceed 3000 gallons and 3550 gallons, respectively, based upon a rolling 12-month summation of the coating usage figures	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(C) OR - Limit is an operational restriction on coating usage. ET - Compliance demonstrated through record keeping of coating usage.
K002	6.1 tons of VOC per rolling, 12-month period	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(C) OR - Restriction on coating usage to restrict annual emissions. ET - Compliance determined through monthly and daily VOC record keeping.

K002 and R004	The VOC content of each car color coating and each red spot primer shall not exceed 2.91 pounds of VOC per gallon of coating and 0.98 pound of VOC per gallon of coating, respectively	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(C) ET - Compliance demonstrated through monthly records of the VOC content of each coating.
K003	30.70 lbs of OC/day for coatings	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance with limitation is determined through records of daily coating usage and of the coatings' OC content information.
K003	64.0 tons of OC/year for coatings and cleanup materials	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance with limitation is determined through records of monthly coating and cleanup material usage and of OC content information.
K003	149.0 lbs of VOC/day for coatings	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance with limitation is determined through records of daily coating usage and of the coatings' VOC content information.

K003	35.0 tons of VOC/year coatings and cleanup materials	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance with limitation is determined through records of monthly coating and cleanup material usage and of VOC content information.
K003	0.1 lb/hr and 0.44 tpy of particulate emissions	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05(A)(3) M, R, Rp, and ET - Compliance is demonstrated through a calculation using an AP-42 emission factor and maximum throughput of pigment.
K003	5% opacity as a six-minute average	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) OR - Permittee is required to operate a double frame filter when this emissions unit is in operation. ET - Monitoring/record keeping to ensure filter is use will ensure compliance with this limitation.
K003	The maximum annual crackle top coating usage shall not exceed 1000 gallons based upon a rolling-12 month summation	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(C) OR - Limit is an operational restriction on coating usage. ET - Compliance demonstrated through record keeping of coating usage.

K003	9.0 tons of any individual HAP per year from all coatings and cleanup materials employed, as a rolling 12-month summation	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(C) OR - Restriction on coating usage to restrict annual emissions. ET - Compliance determined through monthly HAP emission record keeping.
P007	0.5 lb/hr and 2.2 tpy of particulate emissions	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05(A)(3) M, R, Rp, and ET - Compliance is demonstrated through a calculation using an AP-42 emission factor and maximum throughput of pigment.
P007	3.53 lbs/hr of OC	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance is demonstrated through monthly record keeping of solvent and cleanup material usage.
P007	17.5 tpy of OC, including cleanup material emissions	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance is demonstrated through monthly record keeping of solvent and cleanup material usage.
P007	40 lbs/day of Organic Material when employing, applying, evaporating, or drying a photo-chemically reactive material	21-07(G)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance is demonstrated through daily record keeping of solvent and cleanup material usage if a photochemically reactive material is employed.

P007	20% opacity as a six-minute average	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance is demonstrated through weekly visible emission checks.
P009, P010, P011, P012, P013, P014, P015, P016, and P017	8.0 lbs/hr and 40.0 lbs/day of OC*	21-07(G)(2)	N	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, and ET - Compliance is determined through a “worst-case” scenario and using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4.
P009, P010, P011, P012, P013, P014, P015, P016, and P017	7.3 tpy of OC*	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05(A)(3) M, R, Rp, and ET - Compliance is determined through a “worst-case” scenario and using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4.
P018 and P019	2.3 lbs/hr of VOC*	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05(A)(3) M, R, Rp, and ET - Compliance is determined through a “worst-case” scenario and using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4.
P018 and P019	192.6 lbs/day OC*	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance is demonstrated through daily record keeping of the paint production.
P018, P019, and P020	27.6 tpy of OC for P018, P019, and P020 combined	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance is demonstrated through daily record keeping of the paint production. As long as the paint production limitation is not exceed, the emission limitation will not be exceed.

P018 and P019	0.27 lb of individual HAP/ton of paint produced*	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05(C) M, R, Rp, and ET - Compliance is demonstrated through the “worst-case” scenario and using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4.
P018 and P019	0.60 lb of combined HAPs/ton of paint produced*	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05(C) M, R, Rp, and ET - Compliance is demonstrated through the “worst-case” scenario and using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4.
P018, P019, and P020	3.38 tons of individual HAP per year for P018, P019, and P020, combined, as a rolling 12-month summation	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(C) OR - Paint production limitation to limit emissions of HAPs. ET - Compliance is demonstrated through monthly record keeping of the emissions and daily record keeping of the paint production.
P018, P019, and P020	7.54 tons of combined HAPs per year for P018, P019, P020, combined, as a rolling 12-month summation	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(C) OR - Paint production limitation to limit emissions of HAPs. ET - Compliance is demonstrated through monthly record keeping of the emissions and daily record keeping of the paint production.

P018, P019, and P020	40 lbs/day of VOC*	21-07(G)(2)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET - Compliance is demonstrated through daily record keeping of the paint production.
P020	2.56 lbs/hr of VOC	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05(A)(3) M, R, Rp, and ET - Compliance is determined through a “worst-case” scenario and using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4.
P020	191.3 lbs/day of OC	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance is demonstrated through daily record keeping of the paint production.
P020	0.30 lb of individual HAP per ton of paint produced	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05(C) M, R, Rp, and ET - Compliance is demonstrated through the “worst-case” scenario and using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4.
P020	0.67 lb of combined HAPs per ton of paint produced	N	Y	N	N	N	N	N	N	N	N	N	N	N	Other - OAC rule 3745-31-05(C) M, R, Rp, and ET - Compliance is demonstrated through the “worst-case” scenario and using equations from EIIP Preferred and Alternative Methods for Estimating Air Emissions Volume II, Chapter 8, Section 4.
R003 and R006	256.0 lbs/day of VOC*	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance demonstrated through daily record keeping of coating usage and VOC content.
R003 and R006	98.4 lbs/day and 18.0 tpy of acetone for coatings*	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(A)(3) ET - Compliance demonstrated through daily and monthly record keeping of coating usage and acetone content.

R003 and R006	The maximum annual fleckstone coating usage, clear coat coating usage, and the cleanup material usage for this emissions unit shall not exceed 9210 gallons, 1000 gallons, and 640 gallons, respectively, base upon a rolling, 12-month summation of the coating and cleanup material usage figures*	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(C) OR - Limit is an operational restriction on coating usage. ET - Compliance demonstrated through record keeping of coating usage.
R003 and R006	17.31 tons of VOC per rolling 12-month period for coatings and cleanup material*	N	Y	N	Y	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(C) OR - Restriction on coating usage to restrict annual emissions. ET - Compliance determined through monthly and daily VOC record keeping.

R003 and R006	The VOC content of each fleckstone coating, each clear coat coating, and each cleanup material shall not exceed 2.95 pounds of VOC per gallon of coating, 3.45 pounds of VOC per gallon of coating, and 6.26 pounds of VOC per gallon of cleanup material, respectively	N	Y	N	N	Y	N	N	Y	N	Y	N	N	N	Other - OAC rule 3745-31-05(C) ET - Compliance demonstrated through monthly records of the VOC content of each coating.

*The limitation is for each emissions unit.

EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
Misc = miscellaneous requirements

C **Instructions for Part III:**

C All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

C If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.

- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

  When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

  Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

  1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
  2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
  3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
  2. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

  An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

- **Additional information for modifications - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB**

as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.