



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
FRANKLIN COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

Application No: 01-12129

Fac ID: 0125041181

DATE: 4/12/2007

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

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$500** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CDO

FRANKLIN COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 01-12129 FOR AN AIR CONTAMINANT SOURCE FOR
Sherwin Williams Company

On 4/12/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Sherwin Williams Company**, located at **2121 New World Dr, Columbus, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-12129:

Distillation system.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 122 South Front St, P.O. Box 1049, Columbus, OH 43216-1049 [(614)728-3778]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 01-12129

Application Number: 01-12129
Facility ID: 0125041181
Permit Fee: **To be entered upon final issuance**
Name of Facility: Sherwin Williams Company
Person to Contact: Rick Holt
Address: 2121 New World Dr
Columbus, OH 43207

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

**2121 New World Dr
Columbus, Ohio**

Description of proposed emissions unit(s):

Distillation system.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Sherwin Williams Company

PTI Application: 01-12129

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Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0125041181

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (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.)

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	4.05
Individual HAP	9.9
Combined HAP	24.9

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (P180) - Solvent distillation system vented to condenser (200 gallon/hour)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-02(A)	See sections A.2.a and B.1 below.
OAC rule 3745-21-07(G)(2)	See section A.2.b below.
OAC rule 3745-35-07(B) (synthetic minor to avoid Title V and MACT requirements)	See sections A.2.c below.

2. Additional Terms and Conditions

- 2.a "Permit to Install 01-12129 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

The emissions of OC from this emissions unit shall not exceed 4.05 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

- 2.b The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-02(A).
- 2.c The restrictions on the potential to emit for facility-wide individual hazardous air pollutants (HAP), total combined HAP and organic compounds (OC) established under OAC rule 3745-35-07(C) are as follows for the emissions units listed in section C.3 below:
 - i. the facility-wide individual HAP and total HAP emissions shall not exceed 9.9 tons and 24.9 tons as a rolling, 12-month summation, respectively,

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and

- ii. the facility-wide total OC emissions shall not exceed 99.9 tons as a rolling, 12-month summation

Therefore, the permittee, by complying with the federally enforceable terms and conditions, will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing 40 CFR Part 63 Subpart HHHHH. The restrictions to potential to emit (PTE) for this emissions unit, as documented with on-site record keeping at this facility, will ensure that the individual HAP, and total combined HAP and OC, emissions will not exceed the Title V and MACT applicability thresholds.

Therefore, the permittee, by complying with these federally enforceable terms and conditions for emission units, as listed in this permit, will not be subject to Title V permitting and provisions in the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Miscellaneous Coating Manufacturing 40 CFR Part 63 Subpart HHHHH.

¹A 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.

B. Operational Restrictions

1. The average temperature of the exhaust gases from the emission control condenser, for any 3-hour block of time, shall not exceed 50 degrees Fahrenheit and the average temperature shall be maintained as recommended by the manufacturer, with any modifications deemed necessary by the permittee, until such testing has been conducted. If these conditions are exceeded, the control efficiency shall be calculated for the batch and the record of representative emissions maintained for the product batch shall not be used.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall install, operate, and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the emission control condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within ± 1 percent of the temperature being measured or ± 5 degrees Fahrenheit, whichever is greater. The temperature

Emissions Unit ID: **P180**

monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with any modifications deemed necessary by the permittee. The permittee shall collect and calculate the average temperature of the exhaust gases from the condenser, each of the eight, 3-hour blocks of time during each day of operation, and shall record and maintain the following information each day:

- a. all 3-hour blocks of time, when the emissions unit was in operation, during which the average temperature of the exhaust gases from the condenser was more than 11 degrees Fahrenheit above the average temperature recorded during the most recent emission test that demonstrated the emissions unit to be in compliance; and
- b. a log of the downtime for the capture (collection) system, condenser, and monitoring equipment when the associated emissions unit was in operation.

These records shall be maintained at the facility for a period of three years.

2. At the end of each calendar month, the permittee shall calculate and record the following information for each day of the preceding month:
 - a. the number of batches of solvent processed in this emissions unit;
 - b. an identification of how the emissions were calculated for each batch; and
 - c. the summation of actual OC and HAP emissions for each month of operation, from all product batches produced each month; and
 - d. the summation of actual OC and HAP emissions from this emissions unit during the rolling, 12-month period of operation calculated by summing the emissions from each month of operation to the previous 11-month summations.
3. The permittee shall maintain the following monthly records on-site to document compliance with the facility-wide restriction on the potential to emit for OC, individual HAP, and total HAP. The records shall include a minimum of the following information for emissions units P013, P014, P016, P017, P021, P022, P023, P024, P025, P026, P027, P117, P118, P138, P170, P171, P172, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P085, P086, P087, P088, P089, P090, P091, P092, P093, P094, P095, P096, P097, P098, P099, P100, P101, P102, P151, P157, P158, P159, P103, P104, P105, P106, P107, P108,

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P109, P110, P111, P112, P113, P114, P115, P116, P120, P146, P147, P148, P149, P150, P160, P161, P162, P163, P164, P165, P173, P174, P175, P176, P177, P178 and P180 along with any permanent exempt and de minimis emissions units:

- a. the calculated facility-wide OC emissions for the current month, in pounds or tons, for each the above emissions units;
 - b. the rolling, 12-month summation of facility-wide OC emissions (i.e., the OC emissions from the current month added to the summation of the OC emissions from the previous 11 months) for all the above emissions units;
 - c. the calculated facility-wide individual HAP emissions for the current month, in pounds or tons, for each the above emissions units;
 - d. the calculated facility-wide total HAP emissions for the current month, in pounds or tons, for each the above emissions units;
 - e. the rolling 12-month summation of individual HAP emissions (i.e., the individual HAP emissions from the current month added to the summation of the individual HAP emissions from the previous 11 months) for all the above emissions units;
 - f. the rolling 12-month summation of total facility-wide HAP emissions (i.e., the to a; facility-wide HAP emissions from the current month added to the summation of the total facility-wide HAP emissions from the previous 11 months) for all the above emissions units; and
 - g. the rolling 12-month summation of facility-wide OC, individual HAP, total HAP emissions from permanent exempt and de minimis emissions units.
4. The permit to install for emissions units P180 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Emissions Unit ID: P180

Pollutant: MEK

TLV (mg/m³): 590

Maximum Hourly Emission Rate (lbs/hr): 0.93 lbs/hr

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 530MAGLC (ug/m³): 14,047

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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, 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

Emissions Unit ID: P180

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 the 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.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify
 - a. all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified in this permit;
 - b. any records of downtime for the condenser or the monitoring equipment when the emissions unit was in operation.

These quarterly reports shall be submitted by April 30, July 31, October 31, and January 31, and shall cover the records for the previous calendar quarters.

2. The permittee shall submit quarterly deviation (excursion) reports for deviations (excursions) associated with exceedences of the following facility-wide emission limitations and operational restrictions:
 - a. the rolling 12-month individual HAP and total HAP emission limitations listed in term A.2.c.i; and
 - b. the rolling, 12-month OC emission limitation listed in term A.2.c.ii.

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

E. Testing Requirements

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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:

- a. Emission Limitation:

The OC emissions from this emissions unit shall not exceed 4.05 tons per year, based on a rolling, 12-month summation.

Applicable Compliance Method:

The annual OC emission was derived by summing emissions from the ideal gas law calculations of displacement and distillation losses processing 100% methyl ethyl ketone solvent.

Emission lbs/batch = $P(X) V (MW)/RT$ $0.809789359 (1) (401 \text{ ft}^3)$
 $(72.1\text{g})/(10.731 * 510 \text{ R}) = 4.28 \text{ lbs OC/batch}$ $(8760 \text{ hrs}/15 \text{ hrs}) = 2498 \text{ lbs}/2000$
 lbs = 1.25 tons displacement emissions/yr

Distillation Emissions = V_f (volume) = 1 ft³/min; t = 60 min/hr; sf = 100%; T = 510 R (50 degree F) P (MEK vapor pressure) = 0.809789359 psia; MW = 72.1 lb/lb mole; Mole fraction = 1; R = 10.731 psia ft³/lbmol R; T = 510 R (50 degree F)

Emission lbs OC/hr = $P(X) V_f (MW) t (sf)/RT$ $0.809789359 \text{ psia}(1) (1 \text{ ft}^3/\text{min})$
 $(72.1\text{g}) 60\text{min}/(10.731 * 510 \text{ R}) = 0.64 \text{ lbs/hr} * 8760 \text{ hrs/yr}$ 1 ton/2000 lbs = 2.8
 tons controlled emissions/yr

1.25 tons + 2.8 tons = 4.05 tons OC/yr

- b. Emission Limitation:

The facility-wide emissions of individual HAP and total HAP shall not exceed 9.9 tons and 24.9 tons as a rolling, 12-month summation, respectively.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section C.3 of this permit.

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- c. Emission Limitation:
The total facility-wide OC emissions shall not exceed 99.9 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirements specified in section C.3. of this permit.

F. Miscellaneous Requirements

None

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Facility ID: 0125041181

Emissions Unit ID: **P180**

SIC CODE 2851 SCC CODE 49000202 EMISSIONS UNIT ID P180
 EMISSIONS UNIT DESCRIPTION Solvent distillation system vented to condenser (200 gallon/hour)
 DATE INSTALLED 5/1/2007

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	Non-attainment			0.93	4.05
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES: OAC rules 3745-21-07(G)(6) and (G)(7)

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

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

Enter Determination: Compliance with allowable limits and applicable rules

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? x YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: MEK