



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

9/27/2010

Mr. John Dimino
HA INTERNATIONAL LLC
4243 SOUTH AVE
Toledo, OH 43615

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0448011215
Permit Number: P0106804
Permit Type: Initial Installation
County: Lucas

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,


Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
TDES; Michigan; Indiana; Canada



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

HA International produces refractory coatings used in the foundry industry. Typically these are silica-based mixes with water or hydrocarbon-based liquids added. Small amounts of formaldehyde may be added to some products as a preservative. This permit to install/permit to operate is for a proposed organic liquid repackaging operation (P025). This operation will consist of transferring organic liquid products from drums or totes to pails.

3. Facility Emissions and Attainment Status:

This facility is a minor source for carbon monoxide, nitrogen oxides, organic compounds, particulates, and sulfur dioxides. Under PTI 04-01459, the facility was restricted to the following plant-wide emission limitations: 40 tons per year OC emissions, 40 tons per year particulate emissions, 8 tons per year of any individual HAP, and 20 tons per year of combined HAPs. It is located in the City of Toledo in Lucas County. Lucas County is designated attainment or unclassified for all criteria pollutants.

4. Source Emissions:

The repackaging operation allowable emissions are 1.1 tpy OC. The facility-wide emissions will not be revised.

5. Conclusion:

Federally enforceable permit limitations have been volunteered to restrict the maximum container filling operation limits to 200,000 lb/yr (this emissions limitation is based on an emissions factor of 0.011 lb VOC/lb product transferred). With the last permit to install (PTI 04-01459, modified 5/15/2007), we accepted a company-supplied VOC emission factor of 0.034 lb VOC emissions/lb of solvent used for coatings. Since this proposed repackaging activity only constitutes a single transfer operation, the facility has requested a VOC emission factor of one-third the 0.034 lb VOC emissions/lb of solvent used for coatings.

The existing facility-wide limitation of 40 tpy OC will also apply. At these levels, the facility continues to remain a minor source for PSD and Title V purposes.

6. Please provide additional notes or comments as necessary:

This permit to install/permit to operate is for a repackaging operation of liquid organic materials including blends of isopropyl alcohol, ethanol, and silane compounds. The facility receives the liquid organic materials in drums (i.e. the facility does not produce the liquid organic materials on site) and proposes to transfer the liquid organic products from totes or drums to pails. The facility has requested a federally-enforceable maximum annual container filling operational limit of 200,000 lb/yr.



The monthly allowable emissions were established by the facility's ability to unload a 55 gallon drum of liquid organic materials (500 lbs/hr) into 5 gallon pails at approximately 1 drum per hour (11 pails = 1 drum). Therefore, assuming an 8 hour day, 5 days a week work week, 40 drums can be transferred to pails per week, or 200 drums per month. This will be considered potential to emit. Additionally, the rolling, 12-month start-up table will be established using 200 drums per month at 500 lb drums liquid organics transferred per hour = 100,000 lbs/month.

Historically, HA International has contended that the quantity of emissions from their coatings productions processes are similar to those from paint manufacturing processes including raw material transfers prior to processing, the processing step itself, and product packaging operations. With the last permit to install (PTI 04-01459, modified 5/15/2007), we accepted a company-supplied VOC emission factor of 0.034 lb VOC emissions/lb of solvent used for coatings. Since this proposed repackaging activity only constitutes a single transfer operation, the facility has requested a VOC emission factor of one-third the 0.034 lb VOC emissions/lb of solvent used for coatings = 0.011 lb VOC/lb product transferred, which we will accept. At the time of this application, the facility has stated this operation loads mixtures of materials that include: isopropyl alcohol, ethanol, and silane compounds. For calculations we have assumed a "worst case" solvent content of 100%.

The facility does not propose to install any controls on emissions generated from the repackaging operation due to the impracticability of capture and the very low potential emissions. Emissions generated during the product transfer will be exhausted from the facility using an existing ground-level exhaust system in the facility's solvent room, which is a general ventilation unit. We agree with the facility's contention that the emissions are fugitive for permitting purposes and we will count the VOC emissions from the proposed repackaging operation as uncontrolled emissions.

BAT Determination

The PTIO application indicates that based on S.B. 265, a BAT determination is not necessary for all requested allowable emissions less than 10 tpy. The following discussion addresses the S.B. 265 less than 10 tpy exemption:

The BAT determination for the repackaging process will be determined in accordance with the July 2, 2010 (previously issued on February 19, 2010) interoffice memorandum related to the February 2, 2010 U.S. District Court for the Southern District of Ohio ruling in *Sierra Club v. Christopher Korleski*, Director of Ohio EPA; a court decision which does not recognize the less than 10 tpy BAT exemption. This memorandum addresses permit processing after the U.S. District Court <10 tpy exemption decision.

Under this memorandum, the November 30, 2001 version of the BAT rule (OAC rule 3745-31-05) is the current version of the BAT rule (http://www.epa.ohio.gov/dapc/regs/3745_31/3745_31_Historic.aspx). This means the Senate Bill 265 (S.B. 265) exemption cannot be used. The memorandum directs permit writers to develop case-by-case BAT limits following methods used prior to the implementation of S.B. 265. The permit rule citation for less than 10 tpy BAT limits will include both the old rule and the current rule with explanatory language added to the additional terms and conditions.

With an annual operating restriction of 200,000 lbs, OC emissions are less than 10 tpy and the case-by-case BAT exemption will apply. The permit indicates that once the revisions to OAC rule 3745-31-05(A)(3) have been approved by the U.S. EPA, the emissions limitation for VOC set under OAC rule 3745-31-05(A)(3), operational restrictions, monitoring and recordkeeping, and emission testing terms and conditions shall be void.



VOC emissions will be set with the federally enforceable annual operation restriction (200,000 lbs). The permittee has identified a maximum hourly transfer rate of 500 lb/hr. Therefore, permit allowable emissions for the repackaging operation are:

$$0.011 \text{ lb VOC emitted/lb organic materials transferred} * 500 \text{ lb organic materials transferred/hr} = 5.5 \text{ lb VOC/hr}$$

$$0.011 \text{ lb VOC emitted/lb organic materials transferred} * 200,000 \text{ lb organic materials transferred/yr} \div 2,000 \text{ lb/t} = 1.1 \text{ tpy}$$

Since the facility-wide emission limitation for OC = 40 tpy, P025 will be restricted to 40 tpy.

Air Toxics Modeling

Under the State of Ohio air dispersion modeling policy, air dispersion modeling shall be performed for specified air pollutants when an engineering analysis indicates a pollutant will exceed a designated "significant" emission rate. When the potential to emit was calculated for the repackaging process, the results demonstrated that no air toxin exceeds the State of Ohio significant emission rate of 1 TPY and an air toxics analysis is not required.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	1.1 (no facility-wide increase)

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
HA INTERNATIONAL LLC

Issue Date: 9/27/2010

Permit Number: P0106804

Permit Type: Initial Installation

Permit Description: Installation of a liquid repackaging system with federally enforceable limit of 200,000
lbs/yr

Facility ID: 0448011215

Facility Location: HA INTERNATIONAL LLC
4243 SOUTH AVE,
TOLEDO, OH 43615

Facility Description: All Other Miscellaneous Chemical Product and Preparation Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Mary Lehman-Schmidt at Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604 or (419)936-3015. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
HA INTERNATIONAL LLC**

Facility ID: 0448011215
Permit Number: P0106804
Permit Type: Initial Installation
Issued: 9/27/2010
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
HA INTERNATIONAL LLC

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Authorization

Facility ID: 0448011215

Application Number(s): A0039587

Permit Number: P0106804

Permit Description: Installation of a liquid repackaging system with federally enforceable limit of 200,000 lbs/yr

Permit Type: Initial Installation

Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 9/27/2010

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

HA INTERNATIONAL LLC
4243 SOUTH AVE
TOLEDO, OH 43615

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0106804

Permit Description: Installation of a liquid repackaging system with federally enforceable limit of 200,000 lbs/yr

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

Emissions Unit ID:	P025
Company Equipment ID:	liquid repackaging
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Toledo Department of Environmental Services in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions



1. P025, Organic Liquid Repackaging Operation

Operations, Property and/or Equipment Description:

Organic liquid repackaging system

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c., c)(1), d)(1), d)(2), e)(1), f)(1)b., and f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Volatile organic compounds (VOC) emissions shall not exceed 5.5 pounds per hour; and see b)(2)a. and b.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-31-05(D)	VOC emissions from this emissions unit shall not exceed 1.1 tons as a rolling, 12-month summation; and facility-wide emissions of VOC shall not exceed 40 tons as a rolling, 12-month summation.
d.	OAC rule 3745-21-07(G)(2)	Not applicable, see b)(2)d.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- b. The hourly and annual emission limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with these limitations.
- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the potential to emit for VOC is less than 10 tons/year.

The emission limitations and control requirements from the amended rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit shall become void after the U.S. EPA approves the rule revision. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)a., b)(2)a., and f)(1)a.

- d. The Ohio EPA White Paper on the 2006 proposed amendment of OAC rule 3745-21-07 specifies under Section D.18 that "transfer" and "mixing" are not considered "employing" as it relates to employing any photochemically reactive material or substance containing such photochemically reactive material in OAC rule 3745-21-07(G)(2).

c) Operational Restrictions

- (1) The maximum annual amount of material transferred for this emissions unit shall not exceed 200,000 pounds, based upon a rolling, 12-month summation of the production rates.

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



Effective Date: To be entered upon final issuance

Month	Maximum Allowable Cumulative Production
1	100,000
1-2	200,000
1-3	200,000
1-4	200,000
1-5	200,000
1-6	200,000
1-7	200,000
1-8	200,000
1-9	200,000
1-10	200,000
1-11	200,000
1-12	200,000

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

d) Monitoring and/or Recordkeeping Requirements

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

- a. the material transfer rate for each month; and
- b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the material transfer rates.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative material transfer rate for each calendar month.

(2) The permittee shall collect and record the following information for each month for all mixing operations and transfer operations located at this facility:

- a. the company identification for each product manufactured;
- b. the total production rate of each product manufactured;

- c. the number of tons of all liquid organic materials mixed (except P025);
 - d. the VOC emission rate from all liquid organic materials mixed (except P025), i.e., $[(d)(2)f.] \times [0.034]$ in tons per month;
 - e. the company identification for each material transferred in P025;
 - f. the number of pounds of each material transferred in P025;
 - g. the organic compound content of each material, in pounds per gallon, in P025;
 - h. the VOC emission rate from all materials transferred, i.e. $[(d)(2)i.] \times [0.011] \div 2,000$ lb/ton) in tons per month, in P025; and
 - i. the combined facility-wide emissions of VOC for all emissions units, in tons as a rolling, 12-month summation.
- (3) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified federally enforceable permit to install and operate (FEPTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. all exceedances of the rolling, 12-month material transfer rate limitation; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative material transfer rate levels;

The quarterly reports shall be submitted electronically via the Air Services component of Ohio EPA's eBusiness Center by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Toledo Division of Environmental Services).
 - (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



f) Testing Requirements

(1) Compliance with the emission limitations in b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission limitation:

5.5 pounds per hour of VOC from this emissions unit

Applicable compliance method:

This emission limitation was established to reflect the potential to emit for this emissions unit through calculations based on emission factors specified in STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005, as follows: multiply the emission factor in pounds of VOC emissions per pound of material transferred (0.011) by the maximum rate of material addition (500 pounds of material transferred/hr).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and Method 25 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services. If required the permittee shall establish a site specific emission factor based on EPA approved test procedures.

b. Emission Limitation:

1.1 tons VOC as a rolling, 12-month summation from this emissions unit

Applicable Compliance Method:

This emission limitation was established by calculations based on the worst case operating scenario, as follows: multiply the maximum annual rate of material transfer (200,000 lbs/yr) by an emission factor of 0.011 pound of VOC per pound of organic material transferred and dividing by 2,000 pounds/ton. This emission factor is one-third of the emission factor specified in the STAAPA/ALAPCO/USEPA reference document Methods for Estimating Air Emissions from Paint, Ink and Other Coating Manufacturing Facilities, page 8.5-4, dated February 2005.

If required, the permittee shall establish a site specific emission factor based on EPA approved test procedures.

c. Emission limitation:

40 tons per year VOC facility-wide

Applicable compliance method:

Compliance shall be demonstrated through monitoring and record keeping requirements of d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.