



Environmental  
Protection Agency

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

1/7/2011

Ms. Angela Jones  
Rubber Seal  
5751 N. Webster Street  
Dayton, OH 45414

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0857733184  
Permit Number: P0106883  
Permit Type: Renewal  
County: Montgomery

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, Dayton Daily News. 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](http://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 Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280

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 Regional Air Pollution Control Agency at (937)225-4435.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
RAPCA; Indiana; Kentucky



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
Rubber Seal

Issue Date: 1/7/2011

Permit Number: P0106883

Permit Type: Renewal

Permit Description: Administrative modification FEPTIO being processed as a renewal FEPTIO for 12 coating mixers. The facility was previously synthetic minor for HAPs and this FEPTIO includes synthetic minor restrictions for HAPs and VOC emissions.

Facility ID: 0857733184

Facility Location: Rubber Seal  
5751 N. WEBSTER STREET,  
Dayton, OH 45414

Facility Description: Paint and Coating 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 Stephanie Madden at Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280 or (937)225-4435. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Rubber Seal is a manufacturer of coatings and is currently classified as a synthetic minor facility for Hazardous Air Pollutants (HAP). PTI 08-04055 was issued 3/22/01 for emissions units P001-P009 and PTI 08-04619 was issued 10/12/04 for emissions units P010-P012. Both PTI 08-04055 and PTI 08-04619 included federally enforceable restrictions to limit HAP emissions below the Title V threshold of 10 TPY of an individual HAP and 25 TPY total combined HAPs. This PTIO application is for the renewal of those 12 emissions units and the facility has also requested additional synthetic minor restrictions for volatile organic compounds (VOC).

3. Facility Emissions and Attainment Status:

Rubber Seal is located in Montgomery County which is currently in attainment for all criteria pollutants except PM 2.5, which is classified as basic nonattainment. With the issuance of this PTIO and P0106885, the facility wide allowable emissions will be 36.20 TPY VOC, 9.9 tons of any individual HAP and 24.9 tons of total HAPs.

See Table 1.

4. Source Emissions:

Potential VOC emissions from each individual mixer are listed in the Table 1 below. This permit will be issued in draft and will have federally enforceable limitations in order to restrict potential VOC emissions. This PTIO will also include synthetic minor restrictions for HAPs based on facility wide limitations of 9.9 tons of any individual HAP, as a rolling, 12-month summation and 24.9 tons of total HAPs, as a rolling 12-month summation, from all emissions units at the facility. In order to demonstrate compliance with these limitations, the permittee shall maintain monthly records of the individual HAP emission rates, for each HAP, as well as the total HAP emission rates from all emissions units at the facility. Quarterly deviation reports shall be submitted to identify any exceedances of the 12 month rolling annual process limits, the 12-month rolling annual VOC emissions limitations and the 12-month rolling HAP emission limitations.

5. Conclusion:

The terms and conditions in this Federally Enforceable Permit to Install and Operate will limit VOC emissions from emissions units P001-P012 to 17.42 TPY, based on the production limits listed below in Table 1. Federal enforceability of the synthetic minor emission limitation will be achieved through monthly records of the production limitations and VOC emissions. Additionally, limiting the HAP emissions to 9.9 TPY of an individual HAP and 24.9 TPY of any combination of HAPs through federally enforceable terms and conditions and record keeping requirements, will prevent Rubber Seal from triggering Title V or MACT permitting requirements.



Table 1- Facility Wide Emissions

VOC Emissions					HAP Emissions
Emission Unit	Description	Potential VOC Emissions (tons)	12-Month VOC Limit (tons)	12-Month Production Limit (gal)	Facility-Wide 12-Month Emissions (tons)
P001	Clear Products	4.76	4.89	600,000	9.9 individual HAP and 24.9 tons combined HAPs
P002		4.76			
P003		4.76			
P004		4.76			
P008		4.76			
P011		4.76			
P005	Primer Products	7.30	6.55	185,000	
P006		7.30			
P010		7.30			
P012		7.30			
P007	Undercoat Products	7.30	0.66	20,000	
P009	Tank Cleanup	5.32	5.32	n/a	
P013	Silicones	7.67	7.67	n/a	
P019	Sand Mills	47.22	1.26	35,000	
P020		47.22			
P021		47.22			
K001 (Exempt)	QC Spray Booth Bldg 2	3.00	3.00	n/a	
K002 (Exempt)	R&D Spray Booth Bldg 1	3.00	3.00	n/a	
K003 (Exempt)	QC R&D Spray Booth Bldg 2	3.00	3.00	n/a	
P017 (de minimis)	Planetary gray	0.11	0.11	n/a	
P018 (de minimis)	Panetary silver	0.11	0.11	n/a	
P015 (de minimis)	Dispenser gray	0.00	0.00	n/a	
P016 (de minimis)	Dispenser blue	0.00	0.00	n/a	
P014 (de minimis)	Pony Mixer	0.63	0.63	n/a	
<b>Totals:</b>		<b>229.56</b>	<b>36.20</b>		<b>9.9 and 24.9</b>

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>VOC</u>	<u>17.42</u>
<u>Individual HAP</u>	<u>9.9</u>
<u>Combined HAPs</u>	<u>24.9</u>





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Rubber Seal**

Facility ID:	0857733184
Permit Number:	P0106883
Permit Type:	Renewal
Issued:	1/7/2011
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
Rubber Seal

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## Authorization

Facility ID: 0857733184

Application Number(s): A0039028

Permit Number: P0106883

Permit Description: Administrative modification FEPTIO being processed as a renewal FEPTIO for 12 coating mixers. The facility was previously synthetic minor for HAPs and this FEPTIO includes synthetic minor restrictions for HAPs and VOC emissions.

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 1/7/2011

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:

Rubber Seal  
5751 N. WEBSTER STREET  
Dayton, OH 45414

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:

Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280  
(937)225-4435

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: P0106883  
Permit Description: Administrative modification FEPTIO being processed as a renewal FEPTIO for 12 coating mixers. The facility was previously synthetic minor for HAPs and this FEPTIO includes synthetic minor restrictions for HAPs and VOC emissions.

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

**Emissions Unit ID: P007**  
Company Equipment ID: #7 Coating Systems Mixer with Filling Stations  
Superseded Permit Number: 08-04055  
General Permit Category and Type: Not Applicable

**Emissions Unit ID: P009**  
Company Equipment ID: #9 Clean-Up Materials  
Superseded Permit Number: 08-04055  
General Permit Category and Type: Not Applicable

**Group Name: Clear Products Mixers**

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	#1 Coating Systems Mixer with Filling Stations
Superseded Permit Number:	08-04055
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>P002</b>
Company Equipment ID:	#2 Coating Systems Mixer with Filling Stations
Superseded Permit Number:	08-04055
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>P003</b>
Company Equipment ID:	#3 Coating Systems Mixer with Filling Stations
Superseded Permit Number:	08-04055
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>P004</b>
Company Equipment ID:	#4 Coating Systems Mixer with Filling Stations
Superseded Permit Number:	08-04055
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>P008</b>
Company Equipment ID:	#8 Coating Systems Mixer with Filling Stations
Superseded Permit Number:	08-04055
General Permit Category and Type:	Not Applicable
Type:	
<b>Emissions Unit ID:</b>	<b>P011</b>
Company Equipment ID:	#11 Coating Systems Mixer with Filling Stations
Superseded Permit Number:	08-04619
General Permit Category and Type:	Not Applicable
Type:	

**Draft Permit-to-Install and Operate**

Rubber Seal

**Permit Number:** P0106883

**Facility ID:** 0857733184

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

**Group Name: Primer Product Mixers**

<b>Emissions Unit ID:</b>	<b>P005</b>
Company Equipment ID:	#5 Coating Systems Mixer with Filling Stations
Superseded Permit Number:	08-04055
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P006</b>
Company Equipment ID:	#6 Coating Systems Mixer with Filling Stations
Superseded Permit Number:	08-04055
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P010</b>
Company Equipment ID:	#10 Coating Systems Mixer with Filling Stations
Superseded Permit Number:	08-04619
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>P012</b>
Company Equipment ID:	#12 Coating Systems Mixer with Filling Stations
Superseded Permit Number:	08-04619
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 Regional Air Pollution Control Agency 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 submitting<sup>1</sup> 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.

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<sup>1</sup> 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).



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 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. P007, #7 Coating Systems Mixer with Filling Stations

Operations, Property and/or Equipment Description:

#7 Undercoat Mixer with Filling Stations

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)b., c)(1), d)(2), d)(3), e)(1) and f)(1)b. through f)(1)d.

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)	<p>Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 2.19 lbs/hr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).</p>
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and 40 CFR Part 63, Subpart HHHHH National Emission Standard for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing)	<p>The annual VOC emissions from emissions unit P007 shall not exceed 0.66 ton per year (TPY) based upon a rolling, 12-month summation.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P019, P020 P021, de minimis, permit exempt, and permit by rule air contaminant</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.</p> <p>See c)(1).</p>
c.	OAC rule 3745-21-07(G)(2)	<p>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.</p> <p>As per "The White Rubber Corporation v. Director (ERAC Case No. 675153)" decision, OAC rule 3745-21-07(G) shall not apply to an operation that is purely a mixing process with no chemical manufacturing or chemical reaction occurring.</p> <p>See b)(2)b.</p>

(2) Additional Terms and Conditions

- a. The hourly VOC emission limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.
- b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)c.

c) Operational Restrictions

- (1) The maximum amount of undercoat produced in this emissions unit shall not exceed 20,000 gallons per year based upon a rolling, 12-month summation.

## d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this undercoat mixer:
  - a. The company identification for each undercoat produced.
  - b. The number of gallons of each undercoat produced.
  - c. The VOC content of each undercoat produced, in pounds per gallon.
  - d. The total VOC emissions rate for all undercoats produced, in pounds per month calculated by multiplying the number of gallons of each undercoat produced by its respective organic compound content and the AP-42 Section 6.4.1 (1/95) loss factor of 1% of VOC loss/lbs of VOC in product (i.e.,  $d)(1)b. \times d)(1)c. \times 0.01$ ).
- (2) The permittee shall maintain monthly records of the following information:
  - a. the rolling, 12-month summation of the undercoat production; and
  - b. the rolling, 12-month summation of VOC emissions .
- (3) The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P019, P020 and P021):
  - a. The name and identification number of each coating, primer, undercoat, and intermediate produced.
  - b. The individual HAP\* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
  - c. The number of gallons of each coating, primer, undercoat, and intermediate produced.
  - d. The name and identification of each cleanup material employed.
  - e. The individual HAP\* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
  - f. The number of gallons of each cleanup material employed.
  - g. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of  $[d)(3)b.] \times [d)(3)c.] \times$  (appropriate loss factor) +  $[d)(3)e.] \times [d)(3)f.] \times$  (appropriate loss factor for cleanup materials\*\*) for each individual HAP, divided by 2,000 lbs/ton.)
  - h. The rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.

- i. The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in d)(3)h).
- j. The rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

\*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 district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

\*\*The appropriate loss factor for cleanup materials shall be based upon the most recent results of the annual mass balance study of the cleanup emissions required in 2.f)(2) of this permit.

- (4) The permit to install for this emissions unit (P007) 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: toluene

TLV (mg/m<sup>3</sup>): 188

Maximum Hourly Emission Rate (lbs/hr): 12.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 2387

MAGLC (ug/m<sup>3</sup>): 4476

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 still 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.

- (5) 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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the rolling, 12-month emission limitation for VOC;
    - ii. all exceedances of the rolling, 20,000 gallon coating usage restriction;
    - iii. all exceedances of the rolling, 12-month individual HAP emission limitation and of the rolling, 12-month total combined HAPs emission limitation.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year 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 appropriate District Office or local air agency).

- (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 limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

VOC emissions from this emissions unit shall not exceed 2.19 lbs/hr.

Applicable Compliance Method

Compliance with the hourly allowable VOC emission limitation above shall be determined by multiplying the maximum batch capacity of this emissions unit (400 gallons) by the maximum VOC content of all undercoats mixed (6.57 lbs VOC/gal) and the AP-42 Section 6.4.1 (1/95) loss factor of 1% (0.01) lbs of VOC loss/lbs of VOC in product, divided by the number of hours in a batch (12 hrs).

b. Emission Limitation

VOC emissions from this emissions unit shall not exceed 0.66 TPY based upon a rolling, 12-month summation.

Applicable Compliance Method

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping specified in d)(1).

c. Emission Limitation

The maximum amount of undercoat produced in this emissions unit shall not exceed 20,000 gallons per year based upon a rolling, 12-month summation.

Applicable Compliance Method

Compliance with the annual undercoat production restriction above shall be based upon the record keeping specified in d)(2).



d. Emission Limitation

The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P019, P020 P021, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method

Compliance with annual allowable HAPs emissions limitations above shall be based upon the record keeping specified in d)(3).

g) Miscellaneous Requirements

(1) None.



2. P009, #9 Clean-Up Materials

Operations, Property and/or Equipment Description:

Tank cleanup operations

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)b., d)(2), e)(1) 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) PTI 08-04055	<p>Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 29.15 lbs/day and 5.32 tons per year (TPY).</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).</p>
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and 40 CFR Part 63, Subpart HHHHH National Emission Standard for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing)	The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P019, P020 P021, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-07(G)(2)	<p>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.</p> <p>As per "The White Rubber Corporation v. Director (ERAC Case No. 675153)" decision, OAC rule 3745-21-07(G) shall not apply to an operation that is purely a mixing process with no chemical manufacturing or chemical reaction occurring.</p> <p>See b)(2)b.</p>

(2) Additional Terms and Conditions

- a. The daily VOC emission limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.
- b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)c.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the cleanup operations:

- a. The company identification of each cleanup material employed.
- b. The VOC content of each cleanup material employed, in pounds per gallon.

- c. The number of gallons of each cleanup material employed.
- d. The total VOC emission rate from all cleanup materials employed, in pounds per month calculated by multiplying the number of gallons of each cleanup employed by its respective organic compound content and the facility derived mass balance loss factor\* (i.e.,  $d)(1)b. \times d)(1)c. \times$  (appropriate loss factor for cleanup materials)).

\*The appropriate loss factor for cleanup materials shall be based upon the most recent results of the annual mass balance study of the cleanup emissions required in f)(2) of this permit. The initial "Tote and Filling Cleanup Study" was conducted November, 2010 and was determined to be 15% lbs of VOC loss/lbs of VOC in product.

- (2) The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P019, P020 and P021):
  - a. The name and identification number of each coating, primer, undercoat, and intermediate produced.
  - b. The individual HAP\* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
  - c. The number of gallons of each coating, primer, undercoat, and intermediate produced.
  - d. The name and identification of each cleanup material employed.
  - e. The individual HAP\* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
  - f. The number of gallons of each cleanup material employed.
  - g. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of  $[d)(2)b.] \times [d)(2)c.] \times$  (appropriate loss factor) +  $[d)(2)e.] \times [d)(2)f.] \times$  (appropriate loss factor for cleanup materials\*\*) for each individual HAP, divided by 2,000 lbs/ton.)
  - h. The rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.
  - i. The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in d)(2)h).
  - j. The rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

\*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 district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

\*\*The appropriate loss factor for cleanup materials shall be based upon the most recent results of the annual mass balance study of the cleanup emissions required in f)(2) of this permit.

- (3) 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: toluene

TLV (mg/m<sup>3</sup>): 188

Maximum Hourly Emission Rate (lbs/hr): 1.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 231.4

MAGLC (ug/m<sup>3</sup>): 4476

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 still 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.

- (4) 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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the rolling, 12-month individual HAP emission limitation and of the rolling, 12-month total combined HAPs emission limitation.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year 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 appropriate District Office or local air agency).

- (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.

- (3) The permittee shall submit an annual report that includes the results of the annual mass balance study of the cleanup emissions required in f)(2) of this permit. This annual report shall be submitted within 30 days after each mass balance study is performed.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

VOC emissions from this emissions unit shall not exceed 29.15 lbs/day.

Applicable Compliance Method

Compliance with the daily allowable VOC emission limitation above shall be determined by multiplying the maximum daily cleanup usage (26.48 gal/day) by the maximum VOC content of all cleanup materials employed (7.34 lbs VOC/gal), and the facility derived mass balance solvent loss factor in lbs of VOC loss/lbs of VOC in product.

The appropriate loss factor for cleanup materials shall be based upon the most recent results of the annual mass balance study of the cleanup emissions required in f)(2) of this permit. The initial "Tote and Filling Cleanup Study" was conducted November, 2010 and was determined to be 15% lbs of VOC loss/lbs of VOC in product.

b. Emission Limitation

VOC with the annual allowable VOC emission limitation above emissions from this emissions unit shall not exceed 5.30 TPY.

Applicable Compliance Method

Compliance shall be based upon the record keeping specified in d)(1).

c. Emission Limitation

The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P019, P020 P021, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method

Compliance with annual allowable HAPs emissions limitations above shall be based upon the record keeping specified in d)(2).

- (2) The permittee shall conduct, or have conducted, on an annual basis (every 12 months) or when a cleanup solvent with a higher VOC content is introduced, a mass balance study of the clean up emissions at the facility in accordance with the "Tote and Filling Cleanup Study" protocol.

The initial "Tote and Filling Cleanup Study" was conducted November, 2010 and was determined to be 15% lbs of VOC loss/lbs of VOC in product.

g) **Miscellaneous Requirements**

- (1) None.



3. Emissions Unit Group - Clear Products Mixers: P001, P002, P003, P004, P008, P011,

EU ID	Operations, Property and/or Equipment Description
P001	#1 Coating Systems Mixer with Filling Stations
P002	#2 Coating Systems Mixer with Filling Stations
P003	#3 Coating Systems Mixer with Filling Stations
P004	#4 Coating Systems Mixer with Filling Stations
P008	#8 Coating Systems Mixer with Filling Stations
P011	#11 Coating Systems Mixer with Filling Stations

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)b., c)(1), d)(2), d)(3), e)(1) and f)(1)b. through f)(1)d.

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)	<p>Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 1.09 lbs/hr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).</p>
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and 40 CFR Part 63, Subpart HHHHH National Emission Standard for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing)	<p>The combined annual VOC emissions from emissions units P001, P002, P003 P004, P008 and P011 combined shall not exceed 4.89 tons per year (TPY) based upon a rolling, 12-month summation.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in</p>

**Draft Permit-to-Install and Operate**

Rubber Seal

**Permit Number:** P0106883

**Facility ID:** 0857733184

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Section 112(b) of Title III of the Clean Air Act, from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P019, P020 P021, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.</p> <p>See c)(1).</p>
c.	OAC rule 3745-21-07(G)(2)	<p>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.</p> <p>As per "The White Rubber Corporation v. Director (ERAC Case No. 675153)" decision, OAC rule 3745-21-07(G) shall not apply to an operation that is purely a mixing process with no chemical manufacturing or chemical reaction occurring.</p> <p>See b)(2)b.</p>

(2) Additional Terms and Conditions

- a. The hourly VOC emissions limits were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.
- b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)c.

c) Operational Restrictions

- (1) The amount of clear coat products mixed in emissions units P001, P002, P003 P004, P008 and P011 combined shall not exceed 600,000 gallons per year based upon a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this coating mixer:
  - a. The company identification for each coating produced.
  - b. The number of gallons of each coating produced.
  - c. The VOC content of each coating produced, in pounds per gallon.
  - d. The total VOC emission rate for all coatings produced, in pounds per month calculated by multiplying the number of gallons of each coating produced by its respective organic compound content and the facility determined mass balance loss factor of 0.2% lbs of VOC loss/lbs of VOC in product (i.e.,  $d)(1)b. \times d)(1)c. \times 0.002$ ).
- (2) The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003 P004, P008 and P011, combined; :
  - a. the rolling, 12-month summation of VOC emissions, in tons; and
  - b. the rolling, 12-month summation of the clear products production, in gallons.
- (3) The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P019, P020 and P021):
  - a. The name and identification number of each coating, primer, undercoat, and intermediate produced.
  - b. The individual HAP\* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
  - c. The number of gallons of each coating, primer, undercoat, and intermediate produced.
  - d. The name and identification of each cleanup material employed.
  - e. The individual HAP\* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
  - f. The number of gallons of each cleanup material employed.
  - g. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the

sum of [d)(3)b.) x (d)(3)c.) x (appropriate loss factor)] + [d)(3)e. x (d)(3)f.) x (appropriate loss factor for clean up materials\*\*)] for each individual HAP, divided by 2,000 lbs/ton.)

- h. The rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.
- i. The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in d)(3)h).
- j. The rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

\*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 district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

\*\*The appropriate loss factor for cleanup materials shall be based upon the most recent results of the annual mass balance study of the cleanup emissions required in 2.f)(2) of this permit.

- (4) The permit to install for emissions units P001, P002, P003, P004, P008 and P011 were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust systems, 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):

P001, P002, P003 and P004

Pollutant: 2-diethylaminoethanol

TLV (mg/m3): 9.6

Maximum Hourly Emission Rate (lbs/hr): 0.02

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3.857

MAGLC (ug/m3): 228.6

Pollutant: styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 0.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33.17

MAGLC (ug/m3): 2023

Pollutant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 12.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2387

MAGLC (ug/m3): 4476

P011

Pollutant: styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 20.82

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 846

MAGLC (ug/m3): 2029

P008

Pollutant: 1-nitropropane

TLV (mg/m3): 91

Maximum Hourly Emission Rate (lbs/hr): 2.52

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 490.3

MAGLC (ug/m3): 2170

Pollutant: toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 12.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2387

MAGLC (ug/m3): 4476

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 still 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.

- (5) 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.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. all exceedances of the rolling, 12-month emission limitation for VOC;
  - ii. all exceedances of the rolling, 600,000 gallon coating production limitation;
  - iii. all exceedances of the rolling, 12-month individual HAP emission limitation and of the rolling, 12-month total combined HAPs emission limitation.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year 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 appropriate District Office or local air agency).

- (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 limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation

VOC emissions from this emissions unit shall not exceed 1.09 lbs/hr.

- Applicable Compliance Method

Compliance with the hourly allowable VOC emission limitation above shall be determined by multiplying the maximum batch capacity of this emissions unit (400 gallons) by the maximum VOC content of all clear products mixed (8.15 lbs

VOC/gal) and the facility derived loss factor of 0.02% (0.002) lbs of VOC loss/lbs of VOC in product, divided by the number of hours in a batch (6 hrs).

b. Emission Limitation

VOC emissions from emissions units P001, P002, P003 P004, P008 and P011, combined, shall not exceed 4.89 TPY based upon a rolling, 12-month summation.

Applicable Compliance Method

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping specified in d)(2).

c. Emission Limitation

The maximum amount of clear products produced in emissions units P001, P002, P003, P004, P008 and P011, combined, shall not exceed 600,000 gallons per year based upon a rolling, 12-month summation.

Applicable Compliance Method

Compliance with the annual clear products production restriction shall be based upon the record keeping specified in d)(2).

d. Emission Limitation

The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P019, P020 P021, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method

Compliance with annual allowable HAPs emissions limitations above shall be based upon the record keeping specified in d)(3).

g) Miscellaneous Requirements

- (1) None.

4. Emissions Unit Group - Primer Product Mixers: P005, P006, P010, P012,

**EU ID Operations, Property and/or Equipment Description**

P005	#5 Coating Systems Mixer with Filling Stations
P006	#6 Coating Systems Mixer with Filling Stations
P010	#10 Coating Systems Mixer with Filling Stations
P012	#12 Coating Systems Mixer with Filling Stations

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)b., c)(1), d)(2), d)(3), e)(1) and f)(1)b. through f)(1)d.

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)	<p>Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 3.54 lbs/hr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).</p>
b.	<p>OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and 40 CFR Part 63, Subpart HHHHH National Emission Standard for Hazardous Air Pollutants: Miscellaneous Coating Manufacturing)</p>	<p>The combined annual VOC emissions from emissions units P005, P006, P010 and P012 combined shall not exceed 6.55 tons per year (TPY) based upon a rolling, 12-month summation.</p> <p>The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001, P002,</p>

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Rubber Seal

**Permit Number:** P0106883

**Facility ID:** 0857733184

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P019, P020 P021, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.  See c)(1).
c.	OAC rule 3745-21-07(G)(2)	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.  As per "The White Rubber Corporation v. Director (ERAC Case No. 675153)" decision, OAC rule 3745-21-07(G) shall not apply to an operation that is purely a mixing process with no chemical manufacturing or chemical reaction occurring.  See b)(2)b.

(1) Additional Terms and Conditions

- a. The hourly VOC emissions limits were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.
- b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision:  
  
b)(1)c.

c) Operational Restrictions

- (1) The primer production rate in emissions units P005, P006, P010 and P012, combined, shall not exceed 185,000 gallons per year based upon a rolling, 12-month summation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this primer mixer:
  - a. The company identification for each primer produced.
  - b. The number of gallons of each primer produced.
  - c. The VOC content of each primer produced, in pounds per gallon.
  - d. The total VOC emission rate for all primers produced, in pounds per day calculated by multiplying the number of gallons of each primer produced by its respective organic compound content and the AP-42 Section 6.4.1 (1/95) loss factor of 1% lbs of VOC loss/lbs of VOC in product (i.e.,  $d(1)b. \times d(1)c. \times 0.01$ ).
- (2) The permittee shall maintain monthly records of the following information for emissions units P005, P006, P010 and P012, combined:
  - a. the rolling, 12-month summation of VOC emissions, in; and
  - b. the rolling, 12-month summation of the clear products production, in gallons.
- (3) The permittee shall collect and record the following information each month for the entire facility (including, but not limited to emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P019, P020 and P021):
  - a. The name and identification number of each coating, primer, undercoat, and intermediate produced.
  - b. The individual HAP\* content for each HAP of each coating, primer, undercoat, and intermediate produced, in pounds of individual HAP per gallon of coating.
  - c. The number of gallons of each coating, primer, undercoat, and intermediate produced.
  - d. The name and identification of each cleanup material employed.
  - e. The individual HAP\* content for each HAP of each cleanup material, in pounds of individual HAP per gallon of material.
  - f. The number of gallons of each cleanup material employed.
  - g. The total individual HAP emissions for each HAP from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month. (i.e., the sum of  $[d(3)b.] \times [d(3)c.] \times$  (appropriate loss factor)  $+ [d(3)e.] \times [d(3)f.] \times$

(appropriate loss factor for clean up materials\*\*) for each individual HAP, divided by 2,000 lbs/ton.)

- h. The rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.
- i. The total combined HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials, in tons per month (i.e., sum of individual HAP emissions from all coatings, primers, undercoats, intermediates, and cleanup materials as determined in d)(3)h).
- j. The rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.

\*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 district office or local air agency contact. This information does not have to be kept on a line-by-line basis.

\*\*The appropriate loss factor for cleanup materials shall be based upon the most recent results of the annual mass balance study of the cleanup emissions required in 2.f)(2) of this permit.

- (4) The permit to install for this emissions unit (P005, P006, P010, P011 and P012) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust systems, 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):

P005 and P006

Pollutant: styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 0.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 33.17

MAGLC (ug/m3): 2023

Pollutant: isobutyl alcohol

TLV (mg/m3): 151

Maximum Hourly Emission Rate (lbs/hr): 12.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2387

MAGLC (ug/m3): 3595

P010 and P012

Pollutant: styrene

TLV (mg/m3): 85

Maximum Hourly Emission Rate (lbs/hr): 20.82

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 846

MAGLC (ug/m3): 2029

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 still 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.

- (5) 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.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. all exceedances of the rolling, 12-month emission limitation for VOC;
  - ii. all exceedances of the rolling, 185,000 gallon coating production limitation;
  - iii. all exceedances of the rolling, 12-month individual HAP emission limitation and of the rolling, 12-month total combined HAPs emission limitation.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year 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 appropriate District Office or local air agency).

(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 limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

VOC emissions from this emissions unit shall not exceed 3.54 lbs/hr.

Applicable Compliance Method

Compliance with the hourly allowable VOC emission limitation above shall be determined by multiplying the maximum batch capacity of this emissions unit (600 gallons) by the maximum VOC content of all primer products mixed (7.09 lbs VOC/gal) and the AP-42 Section 6.4.1 (1/95) loss factor of 1% (0.01) lbs of VOC loss/lbs of VOC in product, divided by the number of hours in a batch (12 hrs).

b. Emission Limitation

VOC emissions from emissions units P005, P006, P010 and P012, combined, shall not exceed 6.55 TPY based upon a rolling, 12-month summation.

Applicable Compliance Method

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping specified in d)(2).

c. Emission Limitation

The maximum amount of clear products produced in emissions units P005, P006, P010 and P012, combined, shall not exceed 185,000 gallons per year based upon a rolling, 12-month summation.

Applicable Compliance Method

Compliance with the clear products production restriction shall be based upon the record keeping specified in d)(2).

d. Emission Limitation

The emissions of Hazardous Air Pollutants (HAPS), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P019, P020 P021, de minimis, permit exempt, and permit by rule air contaminant sources combined shall be less than 9.9 tons for any single HAP and 24.9 tons for any combination of HAPs, per rolling 12-month summation.

Applicable Compliance Method

Compliance with annual allowable HAPs emissions limitations above shall be based upon the record keeping specified in d)(3).

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g) Miscellaneous Requirements

(1) None.