



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

6/28/2011

Certified Mail

MIKE KUBRIN
Schneller LLC
6019 POWDERMILL RD.
KENT, OH 44240-7109

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1667040015
Permit Number: P0108225
Permit Type: Initial Installation
County: Portage

| | |
|----|------------------------------------|
| 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 |

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Akron Regional Air Quality Management District. 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.

Sincerely,

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

Cc: U.S. EPA
ARAQMD; Pennsylvania; West Virginia; Canada



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Schneller LLC**

| | |
|----------------|----------------------|
| Facility ID: | 1667040015 |
| Permit Number: | P0108225 |
| Permit Type: | Initial Installation |
| Issued: | 6/28/2011 |
| Effective: | 6/28/2011 |



Division of Air Pollution Control
Permit-to-Install
for
Schneller LLC

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1. P002, COMPOUND DEPT. 16



Authorization

Facility ID: 1667040015
Facility Description: Coated Fabrics, Not Rubberized.
Application Number(s): A0041743
Permit Number: P0108225
Permit Description: Initial Installation for the addition of two new mixers and the replacement of two mixers for the compounding room (P002).
Permit Type: Initial Installation
Permit Fee: \$2,900.00
Issue Date: 6/28/2011
Effective Date: 6/28/2011

This document constitutes issuance to:

Schneller LLC
6019 POWDERMILL RD.
KENT, OH 44240-7109

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

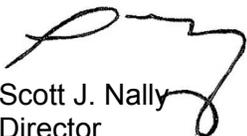
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108225

Permit Description: Initial Installation for the addition of two new mixers and the replacement of two mixers for the compounding room (P002).

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

| | |
|-----------------------------------|----------------|
| Emissions Unit ID: | P002 |
| Company Equipment ID: | COMPOUND DEPT. |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

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

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Akron Regional Air Quality Management District.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Akron Regional Air Quality Management District. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Akron Regional Air Quality Management District every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Akron Regional Air Quality Management District in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



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

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Akron Regional Air Quality Management District.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission

limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Akron Regional Air Quality Management District. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).

- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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



15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. Schneller, LLC has requested to restrict the emissions of volatile organic compounds (VOC) to 222.8 tons per year based upon the rolling, 12-month summation of the monthly emission rates. The company proposed this emission limitation to avoid being classified as a major source for Prevention of Significant Deterioration (PSD). Schneller, LLC has accepted this emission limitation as a facility-wide cap on VOC emissions from the following emissions units: K001, K003, K004, K005, K006, K007, and P002.
3. In order to determine compliance with the facility-wide VOC emission limitation, the permittee shall maintain monthly records of the following information for emissions units: K001, K003, K004, K005, K006, K007, and P002.
 - a) The permittee shall collect and record the following information each month for each controlled emissions units K001, K003, K004, K005, and K007:
 - (1) the name and identification number of each coating employed, as applied;
 - (2) the VOC content of each coating employed, in pounds per gallon, as applied;
 - (3) the number of gallons of each coating employed;
 - (4) the uncontrolled VOC emissions from all the coatings employed, in ton(s) per month for each emissions unit (i.e., the sum of a)(2) times a)(3) for all coatings applied during the month, divided by 2,000 pounds per ton);
 - (5) the calculated, controlled VOC emission rate for all coatings employed, in ton(s) per month for each emissions unit (i.e., the uncontrolled VOC emission rate, calculated in a)(4) above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance);
 - (6) the name and identification of each cleanup material employed;
 - (7) the VOC content of each cleanup material employed, in pounds per gallon, as applied;
 - (8) the number of gallons of each cleanup material employed;
 - (9) the VOC emission rate from all cleanup materials employed, in tons per month for each emissions unit (i.e., the sum of a)(7)times a)(8) for each cleanup material, divided by 2000 pounds per ton);
 - (10) the total VOC emission rate from all coatings and cleanup materials employed for each emissions unit (i.e., a)(5) plus a)(9) for each emissions unit); and

- (11) the total VOC emission rate from all coatings and cleanup materials employed for all controlled emissions units (K001, K003, K004, K005, and K007), in tons per month (i.e., the summation of the VOC emissions from all emissions units in a)(10) above).
- b) The permittee shall collect and record the following information each month for emissions unit K006:
- (1) the name and identification number of each coating and cleanup material, as applied;
 - (2) the VOC content of each coating and cleanup material, in pounds per gallon, as applied;
 - (3) the number of gallons of each coating and cleanup material employed; and
 - (4) the total VOC emissions from all coatings and cleanup materials, in tons per month (i.e., the sum of b)(2) times b)(3) for each coating plus the sum of b)(2) times b)(3) for each cleanup material, divided by 2000 pounds per ton).
- c) The permittee shall collect and record the following information each month for emissions unit P002:
- (1) the amount of material mixed, in pounds per month;
 - (2) the VOC emission rate from the mixing operation, excluding cleanup material, in tons per month (i.e., multiply the emissions factor of 0.00356* pound of VOC per pound of material mixed by c)(1), divided by 2000 pounds per ton);
 - (3) the name and identification of each cleanup material employed;
 - (4) the VOC content of each cleanup material, in pounds of VOC per gallon, as applied;
 - (5) the number of gallons of each cleanup material employed;
 - (6) the VOC emission rate for all cleanup materials employed, in tons per month (i.e., the sum of c)(4) times c)(5) for each cleanup material, divided by 2000 pounds per ton);
 - (7) the total VOC emission rate from the mixing operation and all cleanup materials employed, in tons per month (i.e., the sum of c)(2) plus c)(6)).
- *The VOC emission factor was developed by the company and described in a document entitled "Quantification of Emissions from Compound Mixing", revised December 16, 2003.
- d) The permittee shall collect and record the following information each month for the facility (emissions units K001, K003, K004, K005, K006, K007, and P002):
- (1) the VOC emissions from all the materials employed, in ton(s) per month, i.e., [3.a)(11) + 3)(b)(4) + 3.c)(7)],; and
 - (2) the VOC emissions during the rolling 12-month period, i.e., the summation of all VOC emissions, as recorded in d)(1) above, for the present month plus the previous 11 months of operation, in ton(s).

4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month emission limitation for VOC. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
5. Compliance with the emission limitation in 2 above shall be determined in accordance with the following methods:

- a) Emission Limitation:

222.8 tons of VOC per year based upon the rolling, 12-month summation of the monthly emission rates

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be demonstrated based upon the record keeping requirements established in 3.a), 3.b), 3.c), and 3.d) above.

Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.

C. Emissions Unit Terms and Conditions



1. P002, COMPOUND DEPT.

Operations, Property and/or Equipment Description:

8 mixers for the blending of pigments into raw compounds for subsequent coating and printing operations (See g)(1) below.)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

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) | For CMD Cowles Mixer #2 and CDM Cowles Mixer #4: The emissions of volatile organic compounds (VOC) for each mixer shall not exceed 4.16 pounds per hour and 18.22 tons per year. For CMD Plastisol Mixer #2: The emissions of VOC shall not exceed 0.28 pound per hour and 1.23 tons per year. For the Coating Dept. Mixer: The emissions of VOC shall not exceed 7.39 pounds per hour and 32.37 tons per year. See b)(2)b below. |
| b. | OAC rule 3745-31-05(D) (Synthetic Minor to avoid Prevention of Significant Deterioration (PSD) Permitting) | See 2, 3, 4, and 5 of Section B - Facility-Wide Terms and Conditions. |
| c. | None | 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. |



| | | |
|----|---------------------------|---|
| d. | OAC rule 3745-21-07(G)(2) | If the mixing operation involves chemical manufacturing or a chemical reaction, then the permittee shall not discharge more than 8 pounds of organic compounds (OC) in any one hour into the atmosphere, nor more than 40 pounds of OC in any one day, when photochemically reactive materials, as defined under OAC rule 3745-21-01(C)(5), are employed. |
| e. | OAC rule 3745-21-07(G)(4) | Emissions of OC to the atmosphere from the cleanup with photochemically reactive materials shall be included with the other emissions of OC from this emissions unit for determining compliance with this rule. |

(2) Additional Terms and Conditions

- a. 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 requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The following terms and conditions shall become void after U.S. EPA approves the rule revision: b)(1)c, b)(1)d, b)(1)e, d)(1), d)(2), e)(1), and f)(1)a.
- b. The hourly and annual VOC emission limitations are based on each mixer's potential to emit. Therefore, no monitoring, record keeping or reporting is required to demonstrate compliance with these emission limitations.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain a record of the following information for this emissions unit:
 - a. determination whether or not chemical manufacturing or a chemical reaction occurs for each mixture;
 - b. the MSDS sheets for each liquid organic raw material and cleanup material employed; and
 - c. for each mixture determined to be chemical manufacturing or where a chemical reaction occurs, documentation as to whether or not each liquid organic raw

material and cleanup material is a photochemically reactive material, as defined by OAC rule 3745-21-01(C)(5).

- (2) If it is determined that chemical manufacturing or a chemical reaction occurs and a photochemically reactive material is employed, then the permittee shall collect and record the following information for each day when a subject mixture is processed for each mixer processing the subject mixture:
- a. whether or not chemical manufacturing or a chemical reaction occurs for each mixture;
 - b. the company identification for each raw material and cleanup material;
 - c. documentation of whether or not each raw material or cleanup material employed is a photochemically reactive material;
 - d. the amount of material mixed, in pounds;
 - e. the OC content of each photochemically reactive cleanup material employed, in pounds per gallon;
 - f. the number of gallon of each photochemically reactive cleanup material employed;
 - g. for each day during which chemical manufacturing or a chemical reaction occurs and a photochemically reactive material is employed, the OC emission rate from each mixer, in pounds per day, determined by multiplying the total weight of all mixtures processed that day times the appropriate emission factor, in units of pound of OC per pound of material mixed [the emission factors are referenced in the document entitled "Quantification of Emissions from Compound Mixing", revised December 16, 2003 and it is assumed that VOC equals OC];
 - h. for each day during which chemical manufacturing or a chemical reaction occurs and a photochemically reactive material is employed, the OC emission rate for each mixer from all photochemically reactive cleanup materials employed (i.e., the sum of (e) times (f) for each photochemically reactive material employed);
 - i. for each day during which chemical manufacturing or a chemical reaction occurs and a photochemically reactive material is employed, the total OC emission rate from each mixer including all photochemically reactive cleanup material employed, in pounds per day (i.e., (g) plus (h));
 - j. for each day during which chemical manufacturing or a chemical reaction occurs and a photochemically reactive material is employed, the total number of hours each mixer was in operation; and
 - k. for each day during which chemical manufacturing or a chemical reaction occurs and a photochemically reactive material is employed, the average hourly OC emission rate from each mixer including photochemically reactive cleanup materials employed, in pounds per hour (i.e., (i)/(j)).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. for the days during which chemical manufacturing or a chemical reaction occurred and a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from one or more mixers including photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day for each mixer;
 - b. for the days during which chemical manufacturing or a chemical reaction occurred and a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from one or more mixers including photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day for each mixer.

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

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

If the mixing operation involves chemical manufacturing or a chemical reaction, then the permittee shall not discharge more than 8 pounds of OC in any one hour into the atmosphere, nor more than 40 pounds of OC in any one day, when photochemically reactive materials, as defined under OAC rule 3745-21-01(C)(5), are employed.

Applicable Compliance Method:

Compliance with the hourly and daily OC emission limitations above shall be demonstrated based on the record keeping requirements established in d)(2) above.
 - b. Emission Limitations:

For CMD Cowles Mixer #2 and CDM Cowles Mixer #4: The emissions of VOC for each mixer shall not exceed 4.16 pounds per hour and 18.22 tons per year.

For CMD Plastisol Mixer #2: The emissions of VOC shall not exceed 0.28 pound per hour and 1.23 tons per year.



For the Coating Dept. Mixer: The emissions of VOC shall not exceed 7.39 pounds per hour and 32.37 tons per year.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitations for the CMD Cows Mixer #2 and #4 and CMD Plastisol Mixer #2 above shall be demonstrated by multiplying the VOC emission factor of 0.003562 pound of VOC per pound of material mixed* by the maximum amount of material mixed, in pounds per hour.

Compliance with the hourly allowable VOC emission limitation for the Coating Dept. Mixer above shall be demonstrated by multiplying the VOC emission factor of 0.00211 pound of VOC per pound of material mixed* by the maximum amount of material mixed, in pounds per hour.

The annual allowable VOC emission limitations above were determined by multiplying the hourly allowable VOC emission limitations by 8760 hours per year, and then dividing by 2000. Therefore, as long as compliance with the hourly allowable emission limitations is maintained, compliance with the annual allowable emission limitations shall be assumed.

*The VOC emission factor was developed by the company and described in a document entitled "Quantification of Emissions from Compound Mixing", revised December 16, 2003.

g) Miscellaneous Requirements

(1) Table 1. Compound Room Mixers

| Mixer Identification | Manufacturer | Installation Date | Capacity in pounds per hour |
|----------------------|----------------|-------------------|-----------------------------|
| CMD Cowles #1 | Myers | Prior to 1974 | 1167 |
| CMD Cowles #2 | Cowles | 1989 | 1167 |
| CMD Cowles #3 | Cowles | Prior to 1974 | 1167 |
| CMD Cowles #4 | Cowles | 2005 | 1167 |
| CMD Bench Ink #1 | Delta | Prior to 1974 | 15 |
| CMD Bench Ink #2 | Rockwell/Delta | Prior to 1974 | 15 |
| CMD Plastisol #1 | Custom Built | 1998 | 80 |
| Coating Dept. Mixer | Cowles | 2006 | 3500 |