



State of Ohio Environmental Protection Agency

Street Address:

1800 WaterMark Drive
Columbus, OH 43215-1099

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Mailing Address:

P.O. Box 1049
Columbus, OH 43216-1049

Stark County

RE: Final Permit to Install

Application No: **15-1382**

DATE: **August 4, 1999**

**Harrison Paint Corporation
David Puryear
1329 Harrison Avenue S. W.
Canton, Ohio 44706**

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

Canton Air Pollution Control



Permit to Install
Terms and Conditions

Application Number: 15-1382

APS Premise
Number: 1576050197

Permit Fee: **\$800**

Name of Facility: Harrison Paint Corporation

Person to Contact: David Puryear

Address: 1329 Harrison Avenue S.W.

Canton, Ohio 44706

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

1329 Harrison Avenue S. W.

Canton, Ohio

Description of proposed emissions unit(s):

LATEX PAINT MANUFACTURING EQUIPMENT.

Date of Issuance: August 4, 1999

Effective Date: August 4, 1999

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	4.82
OC	1.75

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Latex paint line with high-speed disperser, slower-speed blending mixer, tanks, and filling and labeling equipment; New Latex Process	OAC rule 3745-31-05	PM: 0.2 gr/ACFM 1.1 pounds/hour (based on an airflow of 6,400 ACFM) 4.82 tons/year Organic Compounds: 9.6 pounds/day 1.75 tons/year See Section A.2.a. below. Visible emissions from the stack servicing this emissions unit shall not exceed five percent opacity as a six-minute average Facility emissions: 9.9 tons of any individual HAP per rolling, 12-month period. 24.9 tons of total HAPs per rolling, 12-month period See Section A.2.b. below.
	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds/hour and 40 pounds/day See Section A.2.a. below
	OAC rule 3745-17-07	BAT is more restrictive.
	OAC rule 3745-17-11	4.6 lbs PM/hr (UCMRE=25 lbs/hr) BAT is more restrictive.

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Harrison Paint Corporation
PTI Application 15-1382
August 4, 1999

Facility ID: 1576050197
Emissions Unit ID: **P009**

2. Additional Terms and Conditions

- 2.a A one-time calculation of the organic compound emissions at maximum operating rates indicates that these limits cannot be exceeded. No daily recordkeeping will be required.
- 2.b The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility, as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 25 tons per rolling, 12-month period for any combination of HAPs.

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

Month(s)	Maximum Allowable Cumulative Emissions of each Individual HAP (tons)	Maximum Allowable Cumulative Emissions Total Combined HAPs (tons)
1	1.0	2.0
1-2	2.0	4.0
1-3	3.0	6.0
1-4	4.0	8.0
1-5	5.0	10.0
1-6	6.0	12.0
1-7	6.7	14.2
1-8	7.3	16.3
1-9	8.0	18.5
1-10	8.6	20.6
1-11	9.3	22.8
1-12	9.9	24.9

- 2.c Only latex paints shall be produced by this emissions unit.

B. Operational Restrictions

- 1. The following work practices shall be employed in order to minimize OC emissions:
 - a. the process tanks shall be covered at all times when they contain OCs, except when access is necessary in order to carry out the process;
 - b. the tanks shall be agitated only as long as is necessary in order to achieve the proper dispersion, blending, and mixing;

- c. the more volatile OCs shall be added as late in the manufacturing process as is practical; and,
 - d. the dispersion and blending/mixing tanks shall be regularly inspected for leaks, and any leaks shall be promptly repaired.
2. The following work practices shall be employed in order to minimize particulate emissions:
- a. the dust collector system shall be properly positioned and operating whenever dry pigment is being added to the high-speed mixer;
 - b. the ducts to the workstations that are not in use will be shut off in order to ensure maximum efficiency of the system;
 - c. the dust collector system shall be inspected each workday;
 - d. the baghouse, which is part of the dust collector system, shall be emptied before enough pigment has accumulated to impair its efficiency; and,
 - e. the dust collector system shall be repaired whenever necessary.
3. The pressure drop across the baghouse shall be maintained within the range of 0.5 to 5.0 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records that document any time periods when the dust collector system was not in service when dry pigments were being added to the high-speed mixer.
2. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a weekly basis.
3. The permittee shall maintain records that document the type of paint being produced by this emissions unit.
4. The permittee shall maintain monthly records of the amount of organic compounds emitted by this emissions unit. About 1 to 2 percent of the solvent is lost in a paint manufacturing process. Several different solvents with various vapor pressures are found in the paints mixed in this emissions unit. In order to differentiate the loss factors for various solvents, they shall be divided into four groups according to their relative evaporation rates as indicated by their vapor pressures. The first group

is for solvents with a vapor pressure at or above 9 mm at 20°C, their loss factor will be 2%. The second group is for solvents with a vapor pressure below 9 mm and at or above 5 mm at 20°C, their loss will be 1.5%. The third group is for solvents with a vapor pressure below 5 mm and above 0.1 mm at 20°C, their loss factor will be 1%. The fourth group is for solvents with a vapor pressure of 0.1 mm or below. The following chart shall be used to calculate OC and HAP emissions:

A Individual Solvent ID HAP (Yes or No)	B Gallons of Solvent	C Solvent Density lb/gal	D $D = B \times C$ Pounds of solvent	E Group #1 >9 mm $E = D \times .02$ Emissions	F Group #2 5-9 mm $F = D \times .015$ Emissions	G Group #3 5-0.1 mm $G = D \times .01$ Emissions	H Group #4 ≤ 0.1 mm No Emissions	I Tons of emissions E,F,G or H/2000

D. Reporting Requirements

1. The permittee shall notify the Canton local air agency in writing of any daily record showing that the dust collector system was not in service when dry pigment was being added to the high-speed mixer. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days after the event occurs.
2. The permittee shall notify the Canton local air agency in writing of any daily record showing that a paint other than latex paint was being produced by this emissions unit. The notification shall include a copy of such record and shall be sent to the Canton local air agency within 30 days after the event occurs.
3. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. an identification of all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above;
 - b. an identification of any rolling, 12-month period in which an individual HAP emissions exceeded 9.9 tons or the combined HAPs emissions exceeded 25 tons from all emissions units at this facility; and,
 - c. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels for individual HAPs and total HAPs.

4. The permittee shall submit annual reports that specify the following information:
 - a. for the entire facility, the rolling, 12-month summations of monthly emissions of individual HAP and total combined HAPs for each month during the calendar year (January through December);
 - b. for the entire facility, the cumulative emissions of individual HAP and total HAPs for each month for the first 12 calendar months of operation; and,
 - c. for each emissions unit, the OC emission rate, in tons per year.

The annual reports shall be submitted by January 31 of each year and shall cover the records for the previous calendar year (January through December).

E. Testing Requirements

1. Compliance with the emission limitation(s) in section A.I. of these terms and conditions shall be determined in accordance with the following methods(s):
 - a. Emission Limitation:
0.2 gr/ACFM and 1.1 pounds PM/hour

Applicable Compliance Method:
If required, Method 5.
 - b. Emission Limitation:
9.6 pounds OC/day

Applicable Compliance Method:
A one-time calculation of the maximum emission rate.
 - c. Emission Limitation:
4.82 tons PM/year

Applicable Compliance Method:
This number is a product of the hourly emission limits times 8,760 hours/yr.
 - d. Emission Limitation:
1.75 tons OC/year

Applicable Compliance Method:
This number is a product of the daily limit times 365 days/year.

- e. Emission Limitation:
Visible emissions from the stack servicing this emissions unit shall not exceed five percent opacity as a six-minute average.

Applicable Compliance Method:
If required, Method 9.

- f. Emission Limitation:
9.9 tons of any individual HAP per rolling, 12-month period and 24.9 tons of total HAPs per rolling, 12-month period

Applicable Compliance Method:
Recordkeeping

F. Miscellaneous Requirements

- 1. None