



09/17/2026

Mrs. Maria Thompson  
PPG Industries - Delaware  
760 Pittsburgh Drive  
Delaware, OH 43015

**RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL**

Facility ID: 0121010005  
Permit Number: P0140629  
Permit Type: OAC Chapter 3745-31 Modification  
County: Delaware

|     |                                    |
|-----|------------------------------------|
| No  | TOXIC REVIEW                       |
| No  | PSD                                |
| No  | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No  | CEMS                               |
| Yes | MACT/GACT                          |
| No  | NSPS                               |
| No  | NESHAPS                            |
| No  | NETTING                            |
| No  | MAJOR NON-ATTAINMENT               |
| No  | MODELING SUBMITTED                 |
| No  | MAJOR GHG                          |
| No  | SYNTHETIC MINOR TO AVOID MAJOR GHG |

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 facility has been issued for the emissions unit(s) listed in the Authority. 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 Environmental Protection Agency (Ohio EPA) [Weekly Review and Public Notices](#) website. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search webpage: [eDocument Search](#). 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:

Andrea Moore  
Permitting Section  
Ohio EPA, DAPC  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and

Ohio EPA, Central District Office  
50 West Town St. Suite 700  
P.O. Box 1049  
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published on the Ohio EPA [Weekly Review and Public Notices](#) website. 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 Ohio EPA, Central District Office at (614) 644-2270.

Sincerely,

Robert Hodanbosi  
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 - Via E-Mail Notification  
Ohio EPA-CDO

# PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: [\*Weekly Review and Public Notices / Ohio Environmental Protection Agency\*](#) or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-3037 email: [\*HClerk@epa.ohio.gov\*](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install OAC Chapter 3745-31 Modification

PPG Industries - Delaware  
760 Pittsburgh Drive

Delaware, OH 43015

ID#: P0140629

Date of Action: 09/17/2026

Permit Desc: Chapter 31 Modification to include Synthetic Minor limitation for thinners and add additional emissions units to thinners limitation.

The permit and complete instructions for requesting information or submitting comments may be obtained at: <https://ohioepa.commentinput.com> - Search by entering the permit # P0140629 in the "Search Projects" search box.

## Permit Strategy Write-Up

### 1. Check all that apply:

☐ Synthetic Minor Determination

☐ Netting Determination

☒ Chapter 31 Modification

### 2. Source Description:

PPG Industries, Inc. (PPG) owns and operates a coating manufacturing facility in Delaware, Ohio (Delaware Plant, Facility ID 0121010005). Main operations that occur at the plant are the production of resin, coatings, and thinners. The coatings are used in the automotive refinishing and collision market and resins are for industrial and automotive OEM manufacturing.

#### Project

PPG is requesting to modify PTIs P0138959 and P0139032 to include P520 and P522 under the existing synthetic minor throughput limit for the thinners process. PPG is not requesting any changes to the combined thinners throughput limit of 11,780,000 gallons per rolling, 12-month period and emissions are identical across each of the fill lines on a pound per gallon basis.

The only changes to the terms of the original permit (P0138959) are the addition of fill lines (P520 and P522) to the terms as these EU's were not included in the original Synthetic Minor limitation.

The limitations for P519 will not change in this permitting action. This permitting action will add the filling of thinners to P520 through a multi EU limitation of combined thinners throughput limit of 11,780,000 gallons per rolling, 12-month period and emissions are identical across each of the fill lines on a pound per gallon basis. This permitting action will also establish an additional restriction in the amount of thinner that can be processed by P520 to 8,220,000 gal per rolling, 12-month period in addition to the amount of isocyanate that will also be filled. An additional 25.36 TPY of VOCs are added to the Project's PTE – and to equal 39.9 TPY VOCs for Project Titanium. Total VOC emissions from P520 will increase from 12.19 TPY to 37.59 TPY.

#### PSD Applicability

PPG Delaware has undergone several major projects over the last year. They claim that there is no technical dependence between any of the projects and the projects are not economically dependent. As such, per the 1993 3M Memo these are separate projects that should not be aggregated. As such, this project is a modification that will increase the potential to emit from the facility by less than the 40 TPY of VOC Significant Emission Rate (SER) threshold and therefore PSD permitting is not required for this project.

#### 40 CFR Part 63, Subpart HHHHH

PPG is a manufacturing facility where 5H applies as: it has a PTE greater than 10 TPY of any single HAP or greater than 25 TPY of any combination of HAP's; manufactures coatings; process, use, or produce HAP; and are not an affected source under any other subpart in part 63.

The fill lines meet the definition of a Group 2 transfer operation as they do not meet the definition of a Group 1 transfer operation but are loading racks that are used to fill other types of containers such as cans, drums, and totes.

#### BAT cost Effectiveness Study

A BAT cost effectiveness study is not required as the emission levels for each EU is less than the threshold (80 TPY VOC) set forth by Engineering Guide 89.

### 3. Facility Emissions and Attainment Status:

PPG Delaware is located in Delaware County which is a Maintenance Area for eight-hour ozone and in Attainment for all other criteria pollutants. The facility is a TV facility for VOC and HAP's. The facility emits VOC and PE from paint and resin manufacturing and products of combustion (PE, VOC, SO<sub>2</sub>, NO<sub>x</sub>, CO) from boilers and ovens.

### 4. Source Emissions:

#### P017 Pail Fill Line:

55 gal/container \* 1 container/min \* 60 min/hr = 3,300 gal/hr  
 3,300 gal/hr \* 8,760 hrs/yr = 28,908,000 gal/yr

| Pollutant      | Hourly<br>(lbs/hr) | Annual at PTE (TPY) |
|----------------|--------------------|---------------------|
| VOC            | 20.36              | 89.18               |
| Methanol       | 6.72               | 29.44               |
| Naphthalene    | 0.015              | 0.07                |
| Toluene        | 0.044              | 0.19                |
| Combined HAP's | 6.73               | 29.44               |

#### P509 M5 Machine Fill Line:

1 gal/container \* 45 container/min \* 60 min/hr = 2,700 gal/hr  
 2,700 gal/hr \* 8,760 hrs/yr = 23,652,000 gal/yr

| Pollutant      | Hourly<br>(lbs/hr) | Annual at PTE (TPY) |
|----------------|--------------------|---------------------|
| VOC            | 16.66              | 72.97               |
| Methanol       | 5.50               | 24.08               |
| Naphthalene    | 0.013              | 0.06                |
| Toluene        | 0.036              | 0.016               |
| Combined HAP's | 5.50               | 24.08               |

#### P513 New 5-Gallon Fill Line:

50 gal/min \* 60 min/hr = 3,000 gal/hr  
 3,000 gal/hr \* 8,760 hrs/yr = 26,280,000 gal/yr

| Pollutant      | Hourly<br>(lbs/hr) | Annual at PTE (TPY) |
|----------------|--------------------|---------------------|
| VOC            | 18.51              | 81.07               |
| Methanol       | 6.11               | 26.76               |
| Naphthalene    | 0.014              | 0.06                |
| Toluene        | 0.040              | 0.17                |
| Combined HAP's | 6.11               | 26.76               |

OAC rule 3745-31-05(A)(3) – Greater than 10 TPY VOC source, incorporation of monthly rolling VOC limit in accordance to Hopkins February 2014 Memo. The BAT is established by dividing the max limit established by OAC3745-31-05(D) 36.34 TPY by 12 months.

OAC rule 3745-31-05(D) – Changed to 11,800,000 gal per rolling 12-month period for P017, P509, P513, P520, and P522 combined and 36.34 tons VOC per rolling 12-month period. This limit is based on the assumption that the product with the highest vapor pressure of VOCs is continuously filled by the lines. The revised throughput restriction was developed by setting total project potential VOC emissions to 39.9 TPY, subtracting the combined potential VOC emissions from storage tanks, P397, P398, and P516 (3.56 tpy) 39.9 (tpy) – 3.56 (tpy) x 2,000 (lb/ton) / 6.170 (lb/10<sup>3</sup> gal) x 1,000 (gal/10<sup>3</sup> gal) = 11,780,000 gallons

ORC 3704.03(F): Modeling performed and detailed in permit (less than 80% language added to permit)  
40 CFR, Part 63, Subpart HHHHH: Transfer operations are defined under 40 CFR 63.8105 - Group 2 transfer operations means bulk loading of coating products that does not meet the definition of Group 1 transfer operations, and all loading of coating products from a loading rack to other types of containers such as cans, drums, and totes. The fill lines are used to fill pails, drums, totes, and other containers. As such, they are each considered Group 2 transfer operations under MACT 5H. There are no requirements under Table 5 for Group 2 transfer operations and only the general duty requirements for minimizing emissions are required. No limitations listed.

#### **P520 Isocyanate Drum/Tote Fill Line**

| Isocyanate Throughput (gal/yr) | Original VOC (lb/1,000 gal) | EU Original VOC (TPY) | Original Project VOC (TPY) | EU Thinner Limit (gal/yr) | EU Thinner VOC (TPY) | EU Total VOC (TPY) | Thinners Project VOC (TPY) |
|--------------------------------|-----------------------------|-----------------------|----------------------------|---------------------------|----------------------|--------------------|----------------------------|
| 9,461,000                      | 2.577                       | 12.19                 | 14.53                      | 8,220,000                 | 25.36                | 37.59              | 39.9                       |

2,970 gal/hr \* 8,760 hrs/yr = 26,017,200 gal/yr

#### **Isocyanates Emissions**

9,461,000 gal/yr \* 2.577 lbs VOC/10<sup>3</sup> gal \* ton/2,000 lbs = 12.19 TPY VOC

#### **Thinner Emissions**

2,970 gal/hr \* 6.17 lbs VOC/10<sup>3</sup> gal = 18.32 lbs VOC/hr

8,220,000 gal/yr \* 6.17 lbs VOC/10<sup>3</sup> gal \* ton/2,000 lbs = 25.36 TPY VOC

2,970 gal/hr \* 2.04 lbs methanol/10<sup>3</sup> gal = 6.06 lbs methanol/hr

8,220,000 gal/yr \* 2.04 lbs methanol/10<sup>3</sup> gal \* ton/2,000 lbs = 8.38 TPY methanol

2,970 gal/hr \* 0.0047 lbs naphthalene/10<sup>3</sup> gal = 1.40 lbs naphthalene/hr

8,220,000 gal/yr \* 0.0047 lbs naphthalene/10<sup>3</sup> gal \* ton/2,000 lbs = 0.02 TPY naphthalene

2,970 gal/hr \* 0.013 lbs toluene/10<sup>3</sup> gal = 0.04 lbs toluene/hr

8,220,000 gal/yr \* 0.013 lbs toluene/10<sup>3</sup> gal \* ton/2,000 lbs = 0.05 TPY toluene

OAC rule 3745-31-05(A)(3) - Greater than 10 TPY VOC source, incorporation of monthly rolling VOC limit in accordance with Hopkins February 2014 Memo. The BAT was previously established as 9,461,000 combined fill throughput of isocyanates per rolling, 12-month summation through P519 and P520 combined. This permitting action establishes an additional restriction of thinners through P520 of 8,220,000 gallons per rolling, 12-month summation.

OAC rule 3745-31-05(D) –

P520 Synthetic Minor limitation of 39.9 tons VOC per rolling, 12-month period through a thinner throughput of 8,220,000 gallons per rolling, 12-month period.

Combined Synthetic Minor of 36.64 tons per rolling, 12-monther period through a thinners restriction of 11,800,000 gal thinners per rolling, 12-month period for P017, P509, P513, P520, and P522.

ORC 3704.03(F): Modeling performed and detailed in permit (less than 80% language added to permit)  
40 CFR, Part 63, Subpart HHHHH: Transfer operations are defined under 40 CFR 63.8105 - Group 2 transfer operations means bulk loading of coating products that does not meet the definition of Group 1 transfer operations, and all loading of coating products from a loading rack to other types of containers such as cans, drums, and totes. The fill lines are used to fill pails, drums, totes, and other containers. As such, they are each considered Group 2 transfer operations under MACT 5H. There are no requirements under Table 5 for Group 2 transfer operations and only the general duty requirements for minimizing emissions are required. No limitations listed.

**5. Conclusion:**

Permit recordkeeping, while maintaining compliance with other terms and conditions in the permit, should ensure compliance with applicable state and federal rules.

**6. Please provide additional notes or comments as necessary:**

None

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

Pollutant

Tons Per Year



**Environmental  
Protection  
Agency**

**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install  
for  
PPG Industries - Delaware**

Facility ID: 0121010005  
Permit Number: P0140629  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 09/17/2026  
Effective: To be entered upon final issuance

**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
PPG Industries - Delaware

**Table of Contents**

|                                                                        |    |
|------------------------------------------------------------------------|----|
| Authorization .....                                                    | 9  |
| List of Commonly Used Abbreviations .....                              | 11 |
| A. Standard Terms and Conditions.....                                  | 12 |
| B. Facility Wide Terms and Conditions.....                             | 20 |
| C. Emissions Unit Terms and Conditions .....                           | 22 |
| 1. Emissions Unit Group - Fill Lines (Haz material): P519 andP520..... | 23 |
| 2. Emissions Unit Group - Thinner Fill Lines: P017, P509, P513 .....   | 31 |

## Authorization

Facility ID: 0121010005  
Facility Description: Paints and allied products  
Application Number(s): M0008736, M0008735  
Permit Number: P0140629  
Permit Type: Permit-To-Install  
Permit Fee: \$7,500.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 09/17/2026  
Effective Date: To be entered upon final issuance

This document constitutes issuance of a Permit-to-Install for the emissions unit(s) identified on the following page to:

PPG Industries - Delaware  
760 Pittsburgh Drive  
Delaware, OH 43015

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA, Central District Office  
50 West Town St. Suite 700  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614) 644-2270

The above-named entity is hereby granted this Permit-to-Install 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 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

John Logue  
Director

## Authorization (continued)

Permit Number: P0140629

Permit Description: Chapter 31 Modification to include Synthetic Minor limitation for thinners and add additional emissions units to thinners limitation.

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

### Group Name: Fill Lines (Haz material)

|                                   |                                       |
|-----------------------------------|---------------------------------------|
| <b>Emissions Unit ID:</b>         | <b>P519</b>                           |
| Company Equipment ID:             | Isocyanate Quart and Gallon Fill Line |
| Superseded Permit Number:         | P0139032                              |
| General Permit Category and Type: | Not Applicable P0139032               |
| <b>Emissions Unit ID:</b>         | <b>P520</b>                           |
| Company Equipment ID:             | Drum and Tote Fill Line               |
| Superseded Permit Number:         | P0139032                              |
| General Permit Category and Type: | Not Applicable P0139032               |

### Group Name: Thinner Fill Lines

|                                   |                         |
|-----------------------------------|-------------------------|
| <b>Emissions Unit ID:</b>         | <b>P017</b>             |
| Company Equipment ID:             | Drum/IBC Fill Line      |
| Superseded Permit Number:         | P0138959                |
| General Permit Category and Type: | Not Applicable P0138959 |
| <b>Emissions Unit ID:</b>         | <b>P509</b>             |
| Company Equipment ID:             | M5 Machine Fill Line    |
| Superseded Permit Number:         | P0138959                |
| General Permit Category and Type: | Not Applicable P0138959 |
| <b>Emissions Unit ID:</b>         | <b>P513</b>             |
| Company Equipment ID:             | New 5-Gallon Fill Line  |
| Superseded Permit Number:         | P0138959                |
| General Permit Category and Type: | Not Applicable P0138959 |

# List of Commonly Used Abbreviations

|                                                                   |                                                                  |                                                                                                       |
|-------------------------------------------------------------------|------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|
| AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors | HVLP = high volume, low pressure                                 | PER = Permit Evaluation Report                                                                        |
| ASTM = American Society for Testing and Materials                 | LAER = lowest achievable emission rate                           | PM = particulate matter                                                                               |
| BACT = Best Available Control Technology                          | lb(s)/hr = pound(s) per hour                                     | PM <sub>10</sub> = particulate matter with an aerodynamic diameter less than or equal to 10 microns   |
| BAT = Best Available Technology                                   | LDAR = leak detection and repair                                 | PM <sub>2.5</sub> = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns |
| CAA = Clean Air Act                                               | LPG = liquefied petroleum gas/propane                            | ppb = parts per billion                                                                               |
| CAM = compliance assurance monitoring                             | MACT = maximum achievable control technology                     | ppm = parts per million                                                                               |
| CEMS = continuous emissions monitoring system                     | MAGLC = maximum acceptable ground level concentration            | PSD = Prevention of Significant Deterioration                                                         |
| CFC = chlorofluorocarbon                                          | mg/m <sup>3</sup> = milligrams per cubic meter                   | psi = pounds per square inch                                                                          |
| CFR = Code of Federal Regulations                                 | MM = million                                                     | psia = pounds per square inch absolute                                                                |
| CH <sub>4</sub> = methane                                         | MMBtu = million British Thermal Units                            | PTE = potential-to-emit                                                                               |
| CI = compression ignition                                         | MSDS = material safety data sheet                                | PTI = Permit-to-Install                                                                               |
| CO = carbon monoxide                                              | MSW = municipal solid waste                                      | PTIO = Permit-to-Install and Operate                                                                  |
| CO <sub>2</sub> = carbon dioxide                                  | NAAQS = National Ambient Air Quality Standard                    | PTO = Permit-to-Operate                                                                               |
| COM = continuous opacity monitor                                  | NESHAP = National Emission Standard for Hazardous Air Pollutants | PWR = process weight rate                                                                             |
| DAPC = Division of Air Pollution Control                          | NG = natural gas                                                 | RACM = reasonably available control measures                                                          |
| DO/LAA = District Office/Local Air Agency                         | ng/m <sup>3</sup> = nanograms per cubic meter                    | RACT = reasonably available control technology                                                        |
| dscf = dry standard cubic foot                                    | NH <sub>3</sub> = ammonia                                        | RATA = relative accuracy test audit                                                                   |
| EAC = emissions activity category                                 | NMHC = non-methane hydrocarbons                                  | RTO = regenerative thermal oxidizer                                                                   |
| eDocs = electronic documents database                             | NMOC = non-methane organic compound                              | SB265 = Senate Bill 265                                                                               |
| ERAC = Environmental Review Appeals Commission                    | NO = nitrogen oxide                                              | scfm = standard cubic feet per minute                                                                 |
| ESP = electrostatic precipitator                                  | NO <sub>2</sub> = nitrogen dioxide                               | SI = spark ignition                                                                                   |
| EU = emissions unit                                               | NO <sub>x</sub> = nitrogen oxides                                | SIP = State Implementation Plan                                                                       |
| FEPTIO = Federally Enforceable Permit-to-Install and Operate      | NSPS = New Source Performance Standard                           | SO <sub>2</sub> = sulfur dioxide                                                                      |
| FER = Fee Emissions Report                                        | NSR = New Source Review                                          | SSMP = startup, shutdown, and malfunction plan                                                        |
| FR = Federal Register                                             | NTV = Non-Title V                                                | TDS = total dissolved solids                                                                          |
| GACT = generally achievable control technology                    | O&M = operation and maintenance                                  | TLV = threshold limit value                                                                           |
| GHG = greenhouse gases                                            | OAC = Ohio Administrative Code                                   | TO = thermal oxidizer                                                                                 |
| gr/dscf = grains per dry standard cubic foot                      | OC = organic compound                                            | TPH = ton(s) per hour                                                                                 |
| H <sub>2</sub> S = hydrogen sulfide                               | Ohio EPA = Ohio Environmental Protection Agency                  | TPY = ton(s) per year                                                                                 |
| H <sub>2</sub> SO <sub>4</sub> = sulfuric acid                    | ORC = Ohio Revised Code                                          | TSP = total suspended particulates                                                                    |
| HAP = hazardous air pollutant                                     | Pb = lead                                                        | VE = visible particulate emissions                                                                    |
| HCl = hydrogen chloride                                           | PBR = Permit-By-Rule                                             | VMT = vehicle miles traveled                                                                          |
| HF = hydrogen fluoride                                            | PCB = polychlorinated biphenyl                                   | VOC = volatile organic compound                                                                       |
| Hg = mercury                                                      | PE = particulate emissions                                       | WPP = work practice plan                                                                              |
| hp = horsepower                                                   | PEMS = predictive emissions monitoring system                    | µg/m <sup>3</sup> = micrograms per cubic meter                                                        |

## **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), 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) 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 Ohio EPA, Central District Office.
  - (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 Ohio EPA, Central District Office. The written reports shall be submitted 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 to the Ohio EPA, Central District Office 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 semiannual 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 Ohio EPA, Central District Office 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) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

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

- b) 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.

- c) The permittee shall submit progress reports to the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.
- 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 Ohio EPA, Central District Office. 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, 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) not exempt from the requirement to obtain a permit-to-install.

## **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 once by twelve months if application is made to the Director within a reasonable time before the termination date and the permittee 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 "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director 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 shut down 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.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- 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 any other 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 months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the "Air Services" 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 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**

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

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. The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Section A, Standard Terms and Conditions.
3. Unless other arrangements have been approved by the director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.

## **C. Emissions Unit Terms and Conditions**



**1. Emissions Unit Group - Fill Lines (Haz material): P519 and P520**

| EU ID | Operations, Property and/or Equipment Description                                                                                                                      |
|-------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| P519  | Filling and packaging of quart and gallon containers of isocyanate products (P446) - line designed for filling haz materials                                           |
| P520  | filling and packaging of totes and drums of isocyanate products. Annual thinner throughput restriction is 8,220,000 gallons, based upon a rolling, 12-month summation. |

- 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) b)(1)c., d)(2) through d)(7) and e)(2) below.

- 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. | ORC 3704.03(T) and OAC rule 3745-31-05(A)(3)                                                                                                                                                                                   | <p>The maximum annual combined isocyanate coating throughput for P519 and P520 shall not exceed 9,461,000 gallons, based upon a rolling, 12-month summation of the isocyanate throughput figures.</p> <p>The maximum annual thinner throughput for P520 shall not exceed 8,220,000 gallons, based upon a rolling, 12-month summation of the thinner throughput figures.</p> <p>See b)(2)a., d)(1), e)(1), f)(1)a. and f)(1)b. below.</p> |
| b. | OAC rule 3745-31-05(D)<br>[Synthetic Minor to avoid NSR/PSD]                                                                                                                                                                   | <p>P017, P509, P513, P520, and P522:</p> <p>Combined VOC emissions from thinners filled in these EUs shall not exceed 36.34 tons per rolling, 12-month summation.</p> <p>See b)(2)a., c)(1), d)(1), e)(1), f)(1)c., and f)(1)d. below.</p>                                                                                                                                                                                               |
| c. | ORC 3704.03(F)                                                                                                                                                                                                                 | See d)(2) through d)(7) and e)(2) below.                                                                                                                                                                                                                                                                                                                                                                                                 |
| d. | 40 CFR Part 63, Subpart HHHHH<br>[In accordance with 40 CFR 63.7985 this facility is an existing miscellaneous coating manufacturing facility subject to the emission limitations/control measures specified in this section.] | <p>In accordance with 40 CFR 63.8105, these emissions units are bulk transfer operation that meets the definition of a Group 2 transfer operation.</p> <p>See b)(2)b., c)(2), d)(8), and e)(3) below.</p>                                                                                                                                                                                                                                |

- (2) Additional Terms and Conditions



- a. The permittee shall not exceed the following VOC emissions factors: the worst-case VOC emissions factor in application, A0080541, for thinners filled through P520 is identified by the facility as 6.17 lbs VOC/ 10<sup>3</sup> gal and the worst-case VOC emissions factor for coatings filled is 2.58 lbs VOC/ 10<sup>3</sup> gal.
- b. In accordance with Table 5 40 CFR Part 63, Subpart HHHHH, no emission limits or work practice standards apply to Group 2 transfer operations. The loading operations will be subject to the general duty requirements for minimizing emissions that are outlined in 40 CFR 63.8000(e).

c) Operational Restrictions

- (1) The maximum annual combined thinners fill throughput for P017, P509, P513, P520, and P522 shall not exceed 11,780,000 gallons, based upon a rolling, 12-month summation of the fill throughput figures.
- (2) The permittee shall comply with the applicable operational restrictions and requirements under 40 CFR Part 63, Subpart HHHHH, including the following sections:

|         |                                                      |
|---------|------------------------------------------------------|
| 63.8000 | General requirements                                 |
| 63.8025 | Requirements for transfer operations                 |
| 63.8095 | Applicability of General Provisions to Subpart HHHHH |

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the name and identification number of each product filled;
  - b. the total gallons of product filled;
  - c. the total VOC emissions, in tons;
  - d. the rolling, 12-month VOC emissions, in tons from P520;
  - e. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the isocyanate fill throughput for P519 and P520;
  - f. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the thinner fill throughput of P520;
  - g. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the thinners fill throughput of P017, P509, P513, P520, and P522;
  - h. the rolling, 12-month summation of VOC emissions from P017, P509, P513, P520, and P522; and
- (2) The permit-to-install (PTI) application for emissions units P519 and P520 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust systems, as specified by the permittee. The *Toxic Air Contaminant Statute*, ORC 3704.03(F),



was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01 using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year (tpy) using an air dispersion model such as AERSCREEN, AERMOD, ISCST3 or other Ohio EPA-approved model. The predicted one-hour maximum ground-level concentration results from the approved air dispersion model, were compared to the maximum acceptable ground-level concentration (MAGLC), calculated as described in Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A," as follows:

- a. The exposure limit, expressed as a time-weighted average concentration for a conventional eight-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. Threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices shall be used, if the chemical is listed; or
  - ii. Short-term exposure limit (STEL) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent eight-hour TLV.
- b. The TLV is divided by 10 to adjust the standard from the working population to the general public.
- c. This standard is adjusted to account for the duration of the exposure or the operating hours of the emissions units, that is, *X* hours per day and *Y* days per week, from that of eight hours per day and five days per week.
- d. The resulting calculation shall be used to determine the MAGLC:

$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{5}{Y} = 4 \frac{TLV}{XY} = MAGLC$$

- e. The following summarizes the results of dispersion modeling for the significant toxic contaminant (emitted at one tpy or more) or *worst-case* scenario:
  - i. Toxic Contaminant: MIBK  
TLV (ug/m<sup>3</sup>): 81,930.47  
Maximum Hourly Emissions Rate (lb/hr): 5.11  
Predicted One-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 972.19  
MAGLC (ug/m<sup>3</sup>): 1,950.72
  - ii. Toxic Contaminant: Toluene  
TLV (ug/m<sup>3</sup>): 75,370.14

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

Maximum Hourly Emissions Rate (lb/hr): 1.55

Predicted One-Hour Maximum Ground Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 294.87MAGLC ( $\mu\text{g}/\text{m}^3$ ): 1,794.53

iii. Toxic Contaminant: Xylene

TLV ( $\text{ug}/\text{m}^3$ ): 86,838.45

Maximum Hourly Emissions Rate (lb/hr): 1.87

Predicted One-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 355.72MAGLC ( $\mu\text{g}/\text{m}^3$ ): 2,067.58

- (3) The permittee has demonstrated that emissions of MIBK, toluene, and xylene from emissions units P519 and P520, are calculated to be less than 80 percent of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F).
- (4) Prior to making any physical changes to or changes in the method of operation of the emissions units that could impact the parameters or values that were used in the predicted one-hour maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the one-hour maximum ground-level concentration include, but are not limited to, the following:
- a. Changes in the composition of the materials used or the use of new materials, that would result in the emissions of a new toxic air contaminant with a lower TLV than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application.
  - c. Physical changes to the emissions units or exhaust parameters (for example, increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (5) If the permittee determines the *Toxic Air Contaminant Statute*, ORC 3704.03(F), will be satisfied for the above changes, Ohio EPA will not consider a change to be a *modification* under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), has been documented. If each change meets the definition of a *modification*, the permittee shall apply for and obtain a final PTI prior to the change. The director may consider any significant departure from the operations of the emissions unit described in the permit application as a modification that results in greater emissions than the emissions rate modeled to determine the ground-level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.
- (6) The permittee shall collect, record and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F):



- a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (for example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).
  - b. The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute*, ORC 3704.03(F).
  - c. A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the emissions units to be in compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions.
  - d. The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.
- (7) The permittee shall maintain a record of any change made to a parameter or value entered in the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (8) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements under 40 CFR Part 63, Subpart HHHHH, including the following sections:

|         |                            |
|---------|----------------------------|
| 63.8080 | Recordkeeping requirements |
|---------|----------------------------|

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the rolling, 12-month summation of the isocyanate fill throughput;
  - b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the rolling, 12-month summation of the thinner fill throughput of P520;
  - c. all exceedances of the rolling, 12-month VOC summation limitation for P017, P509, P513, P520, and P522; and
  - d. all exceedances of the rolling, 12-month limitation on thinners fill throughput for P017, P509 P513, P520, and P522.

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

- (2) The permittee shall submit annual reports that include any changes to any parameter or value entered in the dispersion model used to demonstrate compliance with the *Toxic Air*

*Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration. The report shall include:

- a. The original model input.
- b. The updated model input.
- c. The reason for each change to any input parameter.
- d. A summary of the results of the updated modeling, including the input changes.
- e. A statement that the model results indicate that the one-hour maximum ground-level concentration is less than 80 percent of the MAGLC.

If no changes to the emissions, emissions units or the exhaust stacks have been made during the reporting period, then the report shall include a statement to that effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

- (3) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 63, Subpart HHHHH, including the following sections:

|         |                             |
|---------|-----------------------------|
| 63.8070 | Notification requirement(s) |
| 63.8075 | Reporting requirements      |

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. Emissions Limitation

The maximum annual combined isocyanate fill throughput for P519 and P520 shall not exceed 9,461,000 gallons, based upon a rolling, 12-month summation of the fill throughput figures.

Applicable Compliance Method

Compliance with the rolling, 12-month summation of the fill throughput shall be determined through the recordkeeping requirements in d)(1).

- b. Emissions Limitation

The maximum annual thinner fill throughput for P520 shall not exceed 8,220,000 gallons, based upon a rolling, 12-month summation of the fill throughput figures.

Applicable Compliance Method

Compliance with the rolling, 12-month summation of the fill throughput shall be determined through the recordkeeping requirements in d)(1).

- c. Emissions Limitation

P017, P509, P513, P520, and P522: Combined VOC emissions from thinners filled in these EUs shall not exceed 36.34 tons per rolling, 12-month summation.

Applicable Compliance Method



Compliance shall be determined through the recordkeeping requirements in d)(1). The limitation was established by multiplying the worst-case thinners emissions factor of 6.17 lbs VOC/10<sup>3</sup> gal by the restricted thinners fill rolling, 12-month period throughput of 11,780,000 gallons. Compliance with the VOC emissions limitation is ensured by not exceeding the restricted throughputs and worst-case emissions factors.

If required, compliance shall be determined by the applicable testing method in accordance with 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

**2. Emissions Unit Group - Thinner Fill Lines: P017, P509, P513**

| <b>EU ID</b> | <b>Operations, Property and/or Equipment Description</b> |
|--------------|----------------------------------------------------------|
| P017         | Drum/IBC Fill Line                                       |
| P509         | M5 Machine Fill Line                                     |
| P513         | 5-Gallon Fill Line                                       |

- 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) b)(1)c., d)(2) through d)(7) and e)(2) below.

- 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.

|    | <b>Applicable Rules/Requirements</b>                                                                                                                                                                                           | <b>Applicable Emissions Limitations/Control Measures</b>                                                                                                                                           |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| a. | OAC rule 3745-31-05(A)(3)                                                                                                                                                                                                      | <u>P017, P509, and P513:</u><br>3.0 tons VOC per month averaged over a twelve-month rolling period per emissions unit (EU).<br><br>See b)(2)a., d)(1), e)(1), and f)(1)a. below.                   |
| b. | OAC rule 3745-31-05(D)<br>[Synthetic Minor to avoid NSR/PSD]                                                                                                                                                                   | <u>P017, P509, P513, P520, and P522:</u><br>Combined VOC emissions shall not exceed 36.34 tons per rolling, 12-month summation.<br><br>See b)(2)a., c)(1), d)(1), f)(1)b., and f)(1)c. below.      |
| c. | ORC 3704.03(F)                                                                                                                                                                                                                 | See d)(2) through d)(7) and e)(2) below.                                                                                                                                                           |
| d. | 40 CFR Part 63, Subpart HHHHH<br>[In accordance with 40 CFR 63.7985 this facility is an existing miscellaneous coating manufacturing facility subject to the emission limitations/control measures specified in this section.] | In accordance with 40 CFR 63.8105, these emissions units are bulk transfer operation that meets the definition of a Group 2 transfer operation.<br><br>See b)(2)b., c)(2), d)(8), and e)(3) below. |
| e. | 40 CFR Part 63, Subpart A (40 CFR Part 63.1-16)                                                                                                                                                                                | Table 5 to 40 CFR Part 63, Subpart HHHHH – Applicability of General Provisions to Subpart HHHHH shows which parts of the General Provisions in 40 CFR 63.1-16 apply.                               |

- (2) Additional Terms and Conditions

- a. The worst-case VOC emissions factor in the initial application, for thinners filled through P017, P509, and P513 is identified by the facility as 6.17 lbs VOC/ 10<sup>3</sup> gal.



- b. In accordance with Table 5 40 CFR Part 63, Subpart HHHHH, no emission limits or work practice standards apply to Group 2 transfer operations. The loading operations will be subject to the general duty requirements for minimizing emissions that are outlined in 40 CFR 63.8000(e).

c) Operational Restrictions

- (1) The maximum annual combined thinners fill throughput for P017, P509, P513, P520, and P522 shall not exceed 11,780,000 gallons, based upon a rolling, 12-month summation of the fill throughput figures
- (2) The permittee shall comply with the applicable operational restrictions and requirements under 40 CFR Part 63, Subpart HHHHH, including the following sections:

|         |                                                      |
|---------|------------------------------------------------------|
| 63.8000 | General requirements                                 |
| 63.8025 | Requirements for transfer operations                 |
| 63.8095 | Applicability of General Provisions to Subpart HHHHH |

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
- a. the name and identification number of each product filled; the total gallons of product filled;
  - b. the total VOC emissions, in tons;
  - c. the VOC emissions per month averaged over a twelve-month rolling period for each EU;
  - d. the rolling, 12-month summation of VOC emissions from P017, P509, P513, P520, and P522; and
  - e. the rolling, 12-month summation of the thinners fill throughput of P017, P509, P513, P520, and P522.

During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative fill throughput for each calendar month.

- (2) The permit-to-install (PTI) application for emissions units P017, P509, and P513 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust systems, as specified by the permittee. The *Toxic Air Contaminant Statute*, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01 using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year (tpy) using an air dispersion model such as AERSCREEN, AERMOD, ISCST3 or other Ohio EPA-approved model. The predicted one-hour maximum ground-level concentration results from the approved air dispersion model, were compared to the maximum acceptable ground-level concentration (MAGLC), calculated as described in Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A," as follows:



- a. The exposure limit, expressed as a time-weighted average concentration for a conventional eight-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. Threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices shall be used, if the chemical is listed; or
  - ii. Short-term exposure limit (STEL) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent eight-hour TLV.
- b. The TLV is divided by 10 to adjust the standard from the working population to the general public.
- c. This standard is adjusted to account for the duration of the exposure or the operating hours of the emissions units, that is, *X* hours per day and *Y* days per week, from that of eight hours per day and five days per week.

- d. The resulting calculation shall be used to determine the MAGLC:

$$\frac{TLV}{10} \times \frac{8}{X} \times \frac{5}{Y} = 4 \frac{TLV}{XY} = MAGLC$$

- e. The following summarizes the results of dispersion modeling for the significant toxic contaminant (emitted at one tpy or more) or *worst-case* scenario:

- i. Toxic Contaminant: methanol

TLV (mg/m<sup>3</sup>): 262.58

Maximum Hourly Emissions Rate (lb/hr): 19.43

Predicted One-Hour Maximum Ground-Level Concentration (µg/m<sup>3</sup>): 3,685

MAGLC (µg/m<sup>3</sup>): 6,240

- (3) The permittee has demonstrated that emissions of methanol, from emissions units P017, P509, and P513, are calculated to be less than 80 percent of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F).
- (4) Prior to making any physical changes to or changes in the method of operation of the emissions units that could impact the parameters or values that were used in the predicted one-hour maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the one-hour maximum ground-level concentration include, but are not limited to, the following:



- a. Changes in the composition of the materials used or the use of new materials, that would result in the emissions of a new toxic air contaminant with a lower TLV than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application.
  - c. Physical changes to the emissions units or exhaust parameters (for example, increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (5) If the permittee determines the *Toxic Air Contaminant Statute*, ORC 3704.03(F), will be satisfied for the above changes, Ohio EPA will not consider a change to be a *modification* under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), has been documented. If each change meets the definition of a *modification*, the permittee shall apply for and obtain a final PTI prior to the change. The director may consider any significant departure from the operations of the emissions unit described in the permit application as a modification that results in greater emissions than the emissions rate modeled to determine the ground-level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.
- (6) The permittee shall collect, record and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F):
- a. A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (for example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).
  - b. The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute*, ORC 3704.03(F).
  - c. A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the emissions units to be in compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions.
  - d. The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions units or the materials applied.
- (7) The permittee shall maintain a record of any change made to a parameter or value entered in the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.



- (8) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements under 40 CFR Part 63, Subpart HHHHH, including the following sections:

|         |                            |
|---------|----------------------------|
| 63.8080 | Recordkeeping requirements |
|---------|----------------------------|

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- all exceedances of the monthly average VOC limitations for P017, P509 and P513;
  - all exceedances of the rolling, 12-month VOC summation limitation for P017, P509, P513, P520, and P522; and
  - all exceedances of the rolling, 12-month limitation on thinners fill throughput for P017, P509 P513, P520, and P522.

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

- (2) The permittee shall submit annual reports that include any changes to any parameter or value entered in the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration. The report shall include:
- The original model input.
  - The updated model input.
  - The reason for each change to any input parameter.
  - A summary of the results of the updated modeling, including the input changes.
  - A statement that the model results indicate that the one-hour maximum ground-level concentration is less than 80 percent of the MAGLC.

If no changes to the emissions, emissions units or the exhaust stacks have been made during the reporting period, then the report shall include a statement to that effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

- (3) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 63, Subpart HHHHH, including the following sections:

|         |                             |
|---------|-----------------------------|
| 63.8070 | Notification requirement(s) |
| 63.8075 | Reporting requirements      |

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. Emissions Limitation

P017, P509 and P513 shall not exceed 3.0 tons VOC per month averaged over a twelve-month rolling period per EU.

Applicable Compliance Method

Compliance shall be determined through monitoring and recordkeeping in term d)(1). The limitation was established by dividing the OAC 3745-31-05(D) emissions restriction by 12 months.

If required, compliance shall be determined by the applicable testing method in accordance with 40 CFR Part 60, Appendix A.

b. Emissions Limitation

Combined VOC emissions from P017, P509, P513, P520 and P522 shall not exceed 36.34 tons per rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be determined through the recordkeeping requirements in d)(1). The limitation was established by multiplying the worst-case thinners emissions factor of 6.17 lbs VOC/10<sup>3</sup> gal by the restricted thinners fill rolling, 12-month period throughput of 11,780,000 gallons. Compliance with the VOC emissions limitation is ensured by not exceeding the restricted throughputs and worst-case emissions factors.

If required, compliance shall be determined by the applicable testing method in accordance with 40 CFR Part 60, Appendix A.

c. Emissions Limitation

The maximum annual thinner fill throughput for P017, P509, P513, P520, and P522 shall not exceed 11,780,000 gallons, based upon a rolling, 12-month summation of the fill throughput figures.

Applicable Compliance Method

Compliance with the rolling, 12-month summation of the fill throughput shall be determined through the recordkeeping requirements in d)(1).

g) Miscellaneous Requirements

(1) None.