



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

7/5/2013

Certified Mail

CHAD YODER  
ProVia Walnut Creek Facility  
2150 State Route 39  
Sugarcreek, OH 44681

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

Facility ID: 0238000159  
Permit Number: P0112954  
Permit Type: Initial Installation  
County: Holmes

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Holmes County Hub. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified 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 DAPC, Northeast District Office at (330)425-9171.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
Ohio EPA-NEDO





## Permit Strategy Write-Up

1. Check all that apply:   X   Synthetic Minor Determination    Netting Determination
2. Source Description: The facility is classified as a FEPTIO (synthetic minor) facility to limit VOC emissions. The SIC code is 3442 Metal Doors, Sash, And Trim and the NAICS is 332321 Metal Window and Door Manufacturing. Wooden door & window parts and plastic parts are processed at any of several wood and/or plastic working machines (P002 – P004). After partial assembly polyurethane foam is injected in between the door skins at (P001) slabstock manufacturing with rigid polyurethane insulation. Door and window parts are spray coated at R003 – R010.
3. Facility Emissions and Attainment Status: The current facility-wide VOC potential emissions are 74.567 tons VOC/yr from R003 – R009, including emissions from the associated natural gas-fired drying ovens; see Facility-wide Potential to Emit attachment. Each of R003 – R009 currently have VOC content restrictions and rolling 12-month restrictions on coatings usage.

The facility is located in Sugarcreek (Township), in Holmes County, which is in attainment with the criteria pollutant standards, except it has an undesignated status with the 1-hour NO<sub>x</sub> standard and the 1-hour SO<sub>2</sub> standard.

4. Project Emissions: The applications are for the installation of (R011) Flat coating line with a spray booth to coat wooden door jambs and a 0.16 mmBtu/hr natural gas-fired drying oven; and the installation of (R012) Flat spray booth to coat wooden door jambs and a 0.16 mmBtu/hr natural gas-fired drying oven. The project emissions are: 0.104 ton PM<sub>10</sub>/yr, 0.0008 ton SO<sub>2</sub>/yr, 0.112 ton CO/yr, 25.17 tons VOC/yr (with restrictions), 0.134 ton NO<sub>x</sub>/yr; 0.23 ton HAP<sub>M-XYLENE</sub>/yr, and 0.51 ton HAP<sub>TOTAL</sub>/yr (with restrictions).

Without restrictions on coatings usage at each emissions unit the maximum rate from all operations could be 752 tons VOC/yr and 4.43 tons VOC/yr from R011 and R012, respectively. Without restrictions the project would be a major addition of 756.43 tons VOC/yr to a minor VOC source. Without restrictions the project would be a minor HAP source with 7.10 ton HAP<sub>M-XYLENE</sub>/yr and 15.23 ton HAP<sub>TOTAL</sub>/yr.

5. Conclusion: The applicant has requested a 7000 gal<sub>COATING</sub>/rolling 12-months restriction and a 1500 gal<sub>COATING</sub>/rolling 12-months restriction for R011 and R012, respectively to limit potential VOC emissions at each EU. Total, restricted project emissions will be:

R011 - 20.72 tons VOC/yr	0.19 ton HAP <sub>m-XYLENE</sub> /yr	0.42 ton HAP <sub>TOTAL</sub> /yr
R012 - 4.45 tons VOC/yr	0.04 ton HAP <sub>m-XYLENE</sub> /yr	0.089 ton HAP <sub>TOTAL</sub> /yr
<b>Total</b> 25.17 tons VOC/yr	<b>0.23 ton HAP<sub>m-XYLENE</sub>/yr</b>	<b>0.51 ton HAP<sub>TOTAL</sub>/yr</b>

The project is a minor VOC addition of 25.17 tons VOC/yr to a minor VOC source and a minor HAP addition to a minor HAP source; see Facility-wide Potential to Emit attachment. The project and the facility will not be subject to the Title V operating permit requirements. The facility will not be subject to the NESHAP for the Surface Coating of Wood Building Products (40 CFR 63.4680-63.4781 and associated tables).



**Permit Strategy Write-Up**  
ProVia Walnut Creek Facility  
**Permit Number:** P0112954  
**Facility ID:** 0238000159

6. Please provide additional notes or comments as necessary:

A Rush Request was received on 6/05/2013.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE/PM <sub>10</sub>	0.104
VOC	25.17

PUBLIC NOTICE

7/5/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

ProVia Walnut Creek Facility

2150 State Route 39,  
Sugar creek, OH 22740

Holmes County

FACILITY DESC.: Metal Window and Door Manufacturing

PERMIT #: P0112954

PERMIT TYPE: Initial Installation

PERMIT DESC: Installation of (R011) ConveyORIZED spray coating of wood door jambs with a 0.16 mmBtu/hr natural gas-fired drying oven & (R012) Manual spray coating of wood door jambs with a 0.16 mmBtu/hr natural gas-fired drying oven.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Christine McPhee, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
ProVia Walnut Creek Facility**

Facility ID:	0238000159
Permit Number:	P0112954
Permit Type:	Initial Installation
Issued:	7/5/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
ProVia Walnut Creek Facility

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

ProVia Walnut Creek Facility

**Permit Number:** P0112954

**Facility ID:** 0238000159

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

## Authorization

Facility ID: 0238000159  
Application Number(s): A0046622, A0047523  
Permit Number: P0112954  
Permit Description: Installation of (R011) Conveyorized spray coating of wood door jambs with a 0.16 mmBtu/hr natural gas-fired drying oven & (R012) Manual spray coating of wood door jambs with a 0.16 mmBtu/hr natural gas-fired drying oven.  
Permit Type: Initial Installation  
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 7/5/2013  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

ProVia Walnut Creek Facility  
2150 State Route 39  
Sugarcreek, OH 22740

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

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

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)425-9171

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0112954

Permit Description: Installation of (R011) Conveyorized spray coating of wood door jambs with a 0.16 mmBtu/hr natural gas-fired drying oven & (R012) Manual spray coating of wood door jambs with a 0.16 mmBtu/hr natural gas-fired drying oven.

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

**Group Name: R011 & R012**

<b>Emissions Unit ID:</b>	<b>R011</b>
Company Equipment ID:	Flat Line
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R012</b>
Company Equipment ID:	Flat Line Manual Spray Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



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

ProVia Walnut Creek Facility

**Permit Number:** P0112954

**Facility ID:** 0238000159

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

## **A. Standard Terms and Conditions**



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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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



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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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



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

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

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

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

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

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



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

ProVia Walnut Creek Facility

**Permit Number:** P0112954

**Facility ID:** 0238000159

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

## **B. Facility-Wide Terms and Conditions**



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

ProVia Walnut Creek Facility

**Permit Number:** P0112954

**Facility ID:** 0238000159

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

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



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

ProVia Walnut Creek Facility

**Permit Number:** P0112954

**Facility ID:** 0238000159

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

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



**1. Emissions Unit Group -R011 & R012: R011,R012,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
R011	Conveyorized spray coating of wood door jambs with a 0.16 mmBtu/hr natural gas-fired drying oven
R012	Manual spray coating of wood door jambs with a 0.16 mmBtu/hr natural gas-fired drying oven

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3) as effective 11/30/01	Coatings applied in the coating operations associated with R011 and R012 shall not exceed 5.92 pounds of volatile organic compound (VOC) per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average. See b)(2)a and c)(1).  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B) and 3745-17-11(C).



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

ProVia Walnut Creek Facility

**Permit Number:** P0112954

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from the drying oven stack(s) serving these emissions units shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-07(A)(3)(h)	See b)(2)b.
	OAC rule 3745-17-10(B)	The PE rate shall not exceed 0.020 lb per million Btu of actual heat input to the drying oven associated with each emissions unit.
d.	OAC rule 3745-17-11(C)	See c)(2), c)(3), d)(2) through d)(6), and e)(3)a.
e.	OAC rule 3745-18-06(A)	See b)(2)c.
f.	OAC rule 3745-110-03(J)(15)	See b)(2)d.
g.	OAC rule 3745-31-05(D)(1)(b) voluntary restriction to avoid MACT and Title V requirements	See b)(2)e, b(2)f, d)(8) and e)(2).

(2) Additional Terms and Conditions

- a. All cleaning/purge materials applied shall not contain any VOC components, as defined in OAC rule 3745-21-01.
- b. The spray coating operation associated with each emissions unit is not subject to any mass emission limitation in OAC 3745-17-11 and is exempt from the visible particulate emissions limitations established in OAC rule 3745-17-07(A)(1).
- c. Whenever natural gas fuel is the only fuel combusted, the drying oven associated with each of these emissions units is exempt from the requirements of OAC rule 3745-18-06(D), (F) and (G) and from OAC rule 3745-18-44.
- d. The requirements of OAC rule 3745-110-03(A) through (F) shall not apply to any source other than a boiler, gas turbine or internal combustion engine that has the potential to emit less than twenty-five tons per year of nitrogen oxides (NO<sub>x</sub>).
- e. The emissions of VOC from R011 and R012 shall not exceed 20.72 tons/year and 4.44 tons/year, respectively, based upon a rolling, 12-month summation of the monthly emissions from the coating operations. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:



Month(s)	Maximum Allowable Cumulative VOC Emissions, Tons	
	at R011	at R012
0 - 1	1.73	0.37
1 - 2	3.45	0.74
1 - 3	5.18	1.11
1 - 4	6.91	1.48
1 - 5	8.63	1.85
1 - 6	10.36	2.22
1 - 7	12.09	2.59
1 - 8	13.81	2.96
1 - 9	15.54	3.33
1 - 10	17.27	3.70
1 - 11	18.99	4.07
1 - 12	20.72	4.44

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

- f. The maximum annual coating usage for R011 and R012 shall not exceed 7000 gallons and 1500 gallons, respectively, based upon a rolling, 12-month summation of the coating usage figures. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage, Gallons	
	at R011	at R012
0 - 1	583	125
1 - 2	1167	250
1 - 3	1750	375
1 - 4	2333	500
1 - 5	2917	625
1 - 6	3500	750
1 - 7	4083	875



1 - 8	4667	1000
1 - 9	5250	1125
1 - 10	5833	1250
1 - 11	6417	1375
1 - 12	7000	1500

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

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in the drying ovens associated with these emissions units.
- (2) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever any of these emissions units are in operation and shall maintain the dry particulate filters in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (3) In the event a particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in any of these emissions units.
- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter associated with each emissions unit, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.
- (3) The permittee shall conduct periodic inspections of the dry particulate filter associated with each emissions unit to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.



- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter associated with each emissions unit while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system associated with each emissions unit and shall maintain the following information:
- a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the Ohio EPA Northeast District Office upon request.

- (6) The permittee shall maintain records that document any time periods when the dry particulate filter associated with each emissions unit was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (7) The permittee shall collect and record the following information each day for each emissions unit:
- a. the name and identification number of each coating and each cleanup material employed;
  - b. the OC content of each cleanup material employed, in pounds per gallon, excluding water;
  - c. an identification of whether the cleanup material contains any VOC components;
  - d. the VOC content of each coating employed, in pounds per gallon, excluding water and exempt solvents, as applied;
  - e. the number of gallons of each coating and each cleanup material employed;
  - f. the total number of gallons of all the coatings employed;
  - g. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in f)(1)c. for  $C_{VOC,2}$ ;
  - h. the total VOC emissions from all the coatings employed, in pounds, i.e., the sum of d)(7)d. times d)(7)e. for each coating employed; and





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- ii. all exceedances of the rolling, 12-month limitation on coating usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Northeast District Office).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. The report shall identify of the following for each of these emissions units:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that have been detected by the monitoring, record keeping and/or testing requirements in this permit:
  - i. any daily record showing that cleaning/purge materials, containing any VOC components, were applied;
  - ii. any daily record showing that the dry particulate filter system associated with each emissions unit was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation; and
  - iii. any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation in b)(1);
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).



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

f) Testing Requirements

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

a. Emission Limitation:

Visible PE from the drying oven stack(s) serving these emissions units shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emission limitation shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

The PE rate shall not exceed 0.020 lb per million Btu of actual heat input to the drying oven associated with each emissions unit.

Applicable Compliance Method:

Compliance may be demonstrated based upon the following estimation method(s):

$$PE(\text{lb/mmBtu}) = EF/(\text{Btu}/\text{cf}).$$

where:

PE(lb/mmBtu) = the PE rate, which is estimated to be 0.0072 pound of PE/PM<sub>10</sub> per million Btu actual heat input;

EF = emissions factor, which is 7.6 lb PE-PE<sub>10</sub> per million cubic foot of natural gas fuel flow per AP42 Table 1.4-2. Chap. 1.4 (7, 1998); and

Btu/cf = factor to convert heat input to cubic foot of natural gas fuel flow, which is 1050 Btu/cf as specified in the application for FEPTIO P0112954.

c. Emission Limitation:

Coatings applied in the coating operations associated with emissions units R011 and R012 shall not exceed 5.92 pounds of VOC per gallon of coating, excluding water and exempt solvents, as a daily volume-weighted average.



Applicable Compliance Method:

Compliance may be based on the following estimation method(s):

$$(C_{VOC,2})_A = \frac{\sum_{i=1}^n [(C_{VOC,2i} L_{Ci}) (V_{Si} + V_{VOCi})]}{\sum_{i=1}^n L_{Ci} (V_{Si} + V_{VOCi})}$$

where:

$(C_{VOC,2})_A$  = the daily volume-weighted average VOC content of all coatings, as applied, as specified in OAC rule 3745-21-10(B)(9).

$C_{VOC,2}$  = the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$$C_{VOC,2} = (D_C)(W_{VOC}) / (V_S + V_{VOC}).$$

$D_C$  = the density of a coating, in pounds of coating per gallon of coating.

$$W_{VOC} = W_{VM} - W_W - W_{ES}.$$

$V_S$  = the volume fraction of solids in coating, in gallons of solids per gallon of coating.

$$V_{VOC} = V_{VM} - V_W - V_{ES}.$$

$W_{VM}$  = the weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

$W_W$  = the weight fraction of water in coating, in pound of water per pound of coating.

$W_{ES}$  = the weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

$V_{VM}$  = the volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

$V_W$  = the volume fraction of water in coating, in gallon of water per gallon of coating.

$V_{ES}$  = the volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

$A$  = a subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period  $t$ .

$L_C$  = the liquid volume of coating employed during time period  $t$ , in gallons of coating.



$M_C$  = the mass of coating employed during the time period  $t$ , in pounds of coating.

$i$  = a subscript denoting a specific coating employed during time period  $t$ .

$n$  = the total number of coatings employed during time period  $t$ .

$t$  = the time period specified for the weighted average VOC content is per day and not included in the calculation.

For an alternative compliance method request, the permittee shall submit a written request and receive approval from Ohio EPA before an alternative method, not listed above, may be used for the VOC content determination.

d. Emission Limitations:

The emissions of VOC from R011 and R012 shall not exceed 20.72 tons/year and 4.44 tons/year, respectively, based upon a rolling, 12-month summation of the monthly emissions from the coating operations.

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in d)(8)b for the emissions units specified in C.1 that are subject to the voluntary restrictions for VOC emissions in b)(2)e.

e. Operational Restrictions:

The maximum annual coating usage for R011 and R012 shall not exceed 7000 gallons and 1500 gallons, respectively, based upon a rolling, 12-month summation of the coating usage figures.

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in d)(8)d for the emissions units specified in C.1 that are subject to the voluntary restrictions for coatings usage in b)(2)f.

g) Miscellaneous Requirements

- (1) These emissions units do not coat wood furniture and are therefore not subject to the requirements of OAC rule 3745-21-15 nor to the requirements of 40 CFR Part 63, Subpart JJ - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations (40 CFR 63.800-63.808 and associated tables).
- (2) These emissions units are located in Holmes County and not in any county identified in OAC rule 3745-21-24(A)(1) and are therefore not subject to the requirements of OAC rule 3745-21-24 for coating of flat wood paneling.



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- (3) The Provia Walnut Creek Facility is an area (minor) source of hazardous air pollutant (HAP) emissions. This source is not subject to the NESHAP for the Surface Coating of Wood Building Products (40 CFR 63.4680 – 63.4781 and associated tables).
  
- (4) Potential VOC emissions are generated from the coating operation and the natural gas-fired drying oven associated with each emissions unit and were estimated to be 20.724 tons VOC/year and 4.444 tons VOC/year for emissions units R011 and R012, respectively.