



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

8/27/2013

Certified Mail

Daniel Schmidt  
Marlite  
202 Harger Street  
Dover, OH 44622

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0679010124  
Permit Number: P0115129  
Permit Type: OAC Chapter 3745-31 Modification  
County: Tuscarawas

|     |                                    |
|-----|------------------------------------|
| Yes | 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:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

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

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)3858501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
Ohio EPA-SEDO; Pennsylvania; West Virginia



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
Marlite**

Facility ID: 0679010124  
Permit Number: P0115129  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 8/27/2013  
Effective: 8/27/2013





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Marlite

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## Authorization

Facility ID: 0679010124  
Facility Description: Coating panels and molding.  
Application Number(s): A0048268  
Permit Number: P0115129  
Permit Description: Chapter 31 modification of the existing Corwood flat coating line to add a reciprocating spray booth and incorporate an increase in the hourly VOC emissions rate without any change to the federally enforceable operating restrictions on VOC emissions in place to avoid PSD new source review requirements for the initial installation of this line  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$200.00  
Issue Date: 8/27/2013  
Effective Date: 8/27/2013

This document constitutes issuance to:

Marlite  
202 Harger Street  
Dover, OH 44622

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

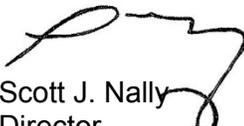
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740)385-8501

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



**Final Permit-to-Install**  
Marlite  
**Permit Number:** P0115129  
**Facility ID:** 0679010124  
**Effective Date:** 8/27/2013

## Authorization (continued)

**Permit Number:** P0115129  
**Permit Description:** Chapter 31 modification of the existing Corwood flat coating line to add a reciprocating spray booth and incorporate an increase in the hourly VOC emissions rate without any change to the federally enforceable operating restrictions on VOC emissions in place to avoid PSD new source review requirements for the initial installation of this line

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

|                                   |   |
|-----------------------------------|---|
| <b>Emissions Unit ID:</b>         | <b>P031</b>                                 |
| Company Equipment ID:             | Coating flat line and associated stack oven |
| Superseded Permit Number:         | 06-06558                                    |
| General Permit Category and Type: | Not Applicable                              |



**Final Permit-to-Install**  
Marlite  
**Permit Number:** P0115129  
**Facility ID:** 0679010124  
**Effective Date:**8/27/2013

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



## **1. Federally Enforceable Standard Terms and Conditions**

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

## **2. Severability Clause**

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

## **3. General Requirements**

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



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

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast 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 DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Southeast 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 semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Southeast 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) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast 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 DAPC, Southeast 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 DAPC, Southeast 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

## **10. Applicability**

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

## **12. Permit-To-Operate Application**

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

## **13. Construction Compliance Certification**

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

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

## **14. Public Disclosure**

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



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

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

**16. Fees**

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

**17. Permit Transfers**

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

**18. Risk Management Plans**

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

**19. Title IV Provisions**

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



**Final Permit-to-Install**  
Marlite  
**Permit Number:** P0115129  
**Facility ID:** 0679010124  
**Effective Date:**8/27/2013

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



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. Emissions units P031 contained in this permit is subject to 40 CFR Part 63, SubpartsMMMM and QQQQ. The complete MACT requirements, including the MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulation (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.



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



**1. P031, Corewood flat coating line**

**Operations, Property and/or Equipment Description:**

Coating flat line originally installed in 2001; includes a superfici spray booth, roll coater, reciprocating spray booth, a curtain coater, and a stack oven equipped with two 0.225 million BTU/hour natural-gas fired burners; Chapter 31 modification of existing line to allow an increase in hourly VOC and particulate emissions from the addition of the superfici spray booth and remove the requirements for the sander that is now included as part of EU P011 with no change to the federally enforceable operating restrictions established in 2001 to avoid PSD review requirements; supersedes PTI 06-06558 issued on 8/28/01

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) g)(1)

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)  | The requirements of this rule are equivalent to the requirements of OAC rule 3745-31-05(D) for volatile organic compound (VOC) emissions.  |
| b. | OAC rule 3745-31-05(D)<br>(Synthetic minor restriction to avoid PSD review for VOC) | VOC emissions shall not exceed 35.15 tons based on a rolling, 12-month summation.<br><br>See c)(1) below.  |
| c. | OAC rule 3745-31-05(A)(3), as effective 11/30/01                                    | Particulate emissions (PE), emissions of particulate matter less than 10 microns (PM <sub>10</sub> ) and emissions of particulate matter less than 2.5 microns (PM <sub>2.5</sub> ) from any stack serving this emissions unit shall not exceed 0.34 pound per hour and 1.49 tons per year.<br><br>No visible PE from any stack serving this emissions unit, and no emissions of fugitive dust.<br><br>Best available control measures that are sufficient to eliminate visible emissions of |



|    | Applicable Rules/Requirements   | Applicable Emissions Limitations/Control Measures   |
|----|---|---|
|    |   | fugitive dust.<br><br>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(C).<br><br>See b)(2)a.-d. below.   |
| d. | OAC rule 3745-31-05(C), as effective 12/01/06   | See b)(2)e. below.  |
| e. | OAC rule 3745-17-11(C)  | See c)(2) and (3) below.  |
| f. | OAC rules 3745-17-07(B) and 3745-17-07(B)   | See b)(2)f. below.  |
| g. | OAC rules 3745-21-09(U)(2)(e)(iii) and 3745-21-09(U)(1)(d)  | This emissions unit shall not employ more than 10 gallons of coating on metal parts in any given day.<br><br>If this emissions unit ever employs more than 10 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents. |
| h. | 40 CFR Part 63, Subpart M<br>(40 CFR 63.3880–3981)<br><br>[In accordance with 40 CFR 63.3881(a) and (b), this emissions unit is an existing miscellaneous metal parts or products surface coating source that uses 250 gallons or more per year of coatings that contain HAPs at a major source of HAP emissions and is subject to the emissions limitations and control measures specified in this section.] | Organic hazardous air pollutant (HAP) emissions from metal parts coating operations in this emissions unit shall not exceed:<br><br>0.31 kg/liter or 2.6 lbs/gallon of coating solids used during each rolling, 12-month period.<br>[40 CFR 63.3890(b)(1)]<br><br>See b)(2)g. below.  |
| i. | 40 CFR 63.1-16 (40 CFR 63.3901)   | Table 2 to Subpart M of Part 63 – Applicability of General Provisions to Subpart M of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply.  |
| j. | 40 CFR Part 63, Subpart Q<br>(40 CFR 63.4680–4781)<br><br>[In accordance with 40 CFR 63.4681(a)(3) and (b), this emissions  | Organic HAP emissions from the coating of wood interior wall paneling or tileboard in this emissions unit shall not exceed:<br><br>183 g/liter of solids or 0.78 lb/gallon of   |



|    | Applicable Rules/Requirements  | Applicable Emissions Limitations/Control Measures  |
|----|--|--|
|    | unit is an existing wood interior wall paneling and tileboard surface coating source that uses 1,100 gallons or more per year of wood building products coatings at a major source of HAP emissions and is subject to the emissions limitations and control measures specified in this section.] | solids used during each rolling, 12-month period.<br>[40 CFR 63.4690(b) and Table 2 of Subpart QQQQ of Part 63]<br><br>See b)(2)h. below.                                |
| k. | 40 CFR 63.1-16<br>(40 CFR 63.4707)   | Table 4 to Subpart QQQQ of Part 63 – Applicability of General Provisions to Subpart QQQQ of Part 63 shows which parts of the General Provisions in 40 CFR 63.1-15 apply. |

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally–approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.
- b. The permittee shall employ best available control measures for the spraying operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee will maintain the enclosure of the above-mentioned spraying operation, and will ensure that the dry filters capture 98% of the emissions from the spraying operation. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. For each spraying operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the dry filter monitoring and daily VE checks conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measure(s) is unnecessary.



- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05(A)(3), as effective 11/30/01.
- e. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

Permit to Install P0115129 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. Except for coatings applied in the roll coater and curtain coater, apply all spray coatings within a spray booth with 98% capture and equipped with dry particulate filters with a minimum 98% control efficiency and the use of spray equipment with a minimum of 60% transfer efficiency for the carousel spray booth and 85% transfer efficiency for the superfici spray booth; and
    - ii. PE shall not exceed 1.49 tons per year.
  - f. This facility is located in Tuscarawas County, which is not identified in Appendix A of OAC rule 3745-17-08. Therefore, the fugitive dust emissions from this emissions unit are exempt from the fugitive dust control requirements and visible emission limitation established in OAC rules 3745-17-08(B) and 3745-17-07(B), respectively.
  - g. The permittee shall comply with the requirements and limitations of 40 CFR Part 63, Subpart MMMM, three years after January 2, 2004 (January 2, 2007).
  - h. The permittee shall comply with the requirements and limitations of 40 CFR Part 63, Subpart QQQQ, three years after May 28, 2003 (May 28, 2006).
- c) Operational Restrictions
- (1) The permittee has requested a federally enforceable limitation on the VOC usage rate in this emissions unit for the purpose of limiting the potential to emit for VOC to avoid PSD requirements. Therefore, the maximum VOC usage rate in this emissions unit shall not exceed 35.15 tons based on a rolling, 12-month summation, where VOC usage is equivalent to VOC emissions. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the organic compound usage rate in this emissions unit upon issuance of this permit.
  - (2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter 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 the 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) The permittee shall identify each type of substrate coated (non-metal, metal, or both) for each day during which the emissions unit is in operation.
- (2) The permittee shall collect and record the following information each day for this emissions unit when metal parts are coated:
  - a. The name and identification number of each metal coating employed.
  - b. The number of gallons of each metal coating employed.
  - c. The total number of gallons of all the metal coatings employed.
- (3) The permittee shall collect and record the following information each month for all coatings and cleanup materials employed in the coating line:
  - a. the name and identification of each coating and cleanup material employed;
  - b. the number of gallons of each coating applied;
  - c. the number of gallons of each cleanup material employed;
  - d. the maximum VOC content of each coating applied, in pounds per gallon;
  - e. the maximum VOC content of each cleanup material employed, in pounds per gallon;
  - f. the total VOC emissions from all coatings and cleanup materials employed, in tons, calculated as the sum of d)(3)b. times d)(3)d. for all coatings plus the sum of d)(3)c. times d)(3)e. for all cleanup materials, multiplied by 1 ton/2,000 pounds;
  - g. the rolling, 12-month summation of the total VOC emissions i.e., the summation of the total VOC emissions, as recorded in d)(3)f. above, for the present month plus the previous 11 months of operation, in ton(s), both on a per booth and combined basis.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

- (4) The permittee, having chosen to demonstrate compliance by means of a daily volume-weighted average VOC content, shall collect and record the following information each day for the coating line when metal parts are coated:



- a. the name and identification number of each coating, as applied;
- b. the mass of VOC per volume of coating (excluding water and exempt solvents) and the number of gallons (excluding water and exempt solvents) of each coating, as applied; and
- c. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ , as follows:

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

where:

$(C_{VOC,2})_A$  is the daily volume-weighted average VOC content of all coatings, as applied.

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

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

$D_C$  = density of 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.

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

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

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

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

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

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

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



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

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

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

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

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

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

- (5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, 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 appropriate Ohio EPA District Office or local air agency upon request.
- (6) The permittee shall conduct periodic inspections of the dry particulate filter 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.
- (7) 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 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.
- (8) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system 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 appropriate Ohio EPA District Office or local air agency upon request.



- (9) The permittee shall maintain records that document any time periods when the dry particulate filter 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.
  - (10) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible emissions of fugitive dust from the areas immediately above and around the capture systems serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
    - a. the color of the emissions;
    - b. the total duration of any visible emissions incident; and
    - c. any corrective actions taken to eliminate the visible emissions
  - (11) See 40 CFR Part 63, Subpart Mmmm (40 CFR 63.3880-3981).
  - (12) See 40 CFR Part 63, Subpart Qqqq (40 CFR 63.4680-4781).
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
  - (2) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.
  - (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
    - a. any monthly record which shows that the total VOC usage rate exceeded 35.15 tons in any 12-month period.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
  - (4) The permittee shall submit semiannual written reports that identify:
    - a. all days during which any visible PE was observed from the stack serving this emissions unit;
    - b. all days during which any visible emissions of fugitive dust were observed from the areas immediately above and around the capture systems serving this emissions unit; and



- c. any corrective actions taken to minimize or eliminate the visible PE from the stack and/or visible emissions of fugitive dust.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

- (5) The permittee shall notify the Ohio EPA, Southeast District Office in writing of any daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southeast District Office within 45 days after the exceedance occurs.
- (6) See 40 CFR Part 63, Subpart MMMM (40 CFR 63.3881-3981).
- (7) See 40 CFR Part 63, Subpart QQQQ (40 CFR 63.4680-4781).

f) Testing Requirements

- (1) Compliance with the emissions limitations and/or control requirements specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:  
 VOC emissions shall not exceed 35.15 tons based on a rolling, 12-month summation.

Applicable Compliance Method:  
 Compliance with the rolling, 12-month VOC emissions limitation shall be based upon the record keeping specified in d)(3)g. of this permit.

- b. Emissions Limitations:  
 PE and emissions of PM<sub>10</sub> and PM<sub>2.5</sub> shall not exceed 0.34 pound per hour and 1.49 tons per year.

Applicable Compliance Method:  
 Compliance with the emissions limitations shall be demonstrated by the following one-time calculations based on maximum coating use rates of 2.5 gallons per hour in the carrousel spray booth, 8.8 gallons per hour in the superfici spray booth, a maximum solids content of 0.25 pounds per gallon for the coating used in the carrousel spray booth, a transfer efficiency of 60% for the carrousel spray booth, a maximum solids content of 6.32 pounds per gallon for the coating used in the superfici spray booth, a transfer efficiency of 85% for the superfici spray booth, capture efficiencies of 99% and control efficiencies of 98% as submitted in the permittee's application:

$$PE \text{ (lb/hr stack)} = [(gallons \text{ per hour coating use in carrousel spray booth} \times \text{maximum solids content of coating used in carrousel spray booth} \times \text{minimum transfer efficiency in the carrousel spray booth}) + (gallons \text{ per hour coating use in superfici spray$$



$$\begin{aligned} & \text{booth X maximum solids content of coating used in} \\ & \text{superfici spray booth X minimum transfer efficiency in the} \\ & \text{superfici spray booth}] \text{ X capture efficiency X control} \\ & \text{efficiency} \\ = & [(2.5 \text{ gallons/hr X } 0.25 \text{ pounds/gallon X } (1-0.60)) + (8.8 \\ & \text{gallons/hr X } 6.32 \text{ pounds/gallon X } (1-0.85)) \text{ X } 0.98 \text{ X } (1- \\ & 0.98) \\ = & 0.17 \text{ pound per hour} \end{aligned}$$

$$\begin{aligned} \text{PE (lb/hr fugitive)} = & [( \text{gallons per hour coating use in carrousel spray booth X} \\ & \text{maximum solids content of coating used in carrousel spray} \\ & \text{booth X minimum transfer efficiency in the carrousel spray} \\ & \text{booth) + (gallons per hour coating use in superfici spray} \\ & \text{booth X maximum solids content of coating used in} \\ & \text{superfici spray booth X minimum transfer efficiency in the} \\ & \text{superfici spray booth)] X \% \text{ not captured} \\ = & [(2.5 \text{ gallons/hr X } 0.25 \text{ pounds/gallon X } (1-0.60)) + (8.8 \\ & \text{gallons/hr X } 6.32 \text{ pounds/gallon X } (1-0.85)) \text{ X } (1-0.98) \\ = & 0.17 \text{ pound per hour} \end{aligned}$$

$$\begin{aligned} \text{Total PE (lb/hr)} = & 0.17 \text{ lb/hr} + 0.17 \text{ lb/hr} \\ = & 0.34 \text{ pound per hour} \end{aligned}$$

If required, hourly particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources", and the procedures specified in OAC rule 3745 17 03(B)(10). Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

$$\begin{aligned} \text{PE (tons/yr)} = & 0.34 \text{ pound per hour emission factor X } 8,760 \text{ hours/yr X } 1 \\ & \text{ton/2,000 pounds} \\ = & 1.49 \text{ tons per year} \end{aligned}$$

- c. Emissions Limitations:  
No visible PE from any stack serving this emissions unit and no visible emissions of fugitive dust.

Applicable Compliance Method:  
If required, visible PE shall be determined according to USEPA Method 22.

- d. Emissions Limitation:  
This emissions unit shall not employ more than 10 gallons of coating on metal parts in any given day. If this emissions unit ever employs more than 10 gallons of coating on metal parts in any given day, thereafter, the VOC content of all metal coatings employed shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.



**Applicable Compliance Method:**

Compliance with coating usage or coating content limitation shall be based upon the record keeping specified in d)(2)c. of this permit.

e. **Emissions Limitation:**

Organic HAP emissions from metal parts coating operations in this emissions unit shall not exceed 0.31 kg/liter or 2.6 lbs/gallon of coating solids used during each rolling, 12-month period.

**Applicable Compliance Method:**

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in d)(11).

f. **Emissions Limitation:**

Organic HAP emissions from the coating of wood interior wall paneling or tileboard in this emissions unit shall not exceed 183 g/liter of solids or 0.78 lb/gallon of solids used during each rolling, 12-month period.

**Applicable Compliance Method:**

Compliance shall be demonstrated based upon the monitoring and recordkeeping requirements specified in d)(12).

- (2) Formulation data or USEPA Method 24 shall be used to determine the VOC content of each non-metal and metal coating.

g) **Miscellaneous Requirements**

- (1) Modeling for organic toxic air contaminants was not required pursuant to Engineering Guide #70, Question 3 because organic HAP emissions from this emissions unit are subject to 40 CFR Part 63 Subparts Mmmm and QQQ. Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary for inorganic air toxic contaminants because the emissions unit's maximum annual emissions for each inorganic toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit-to-install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any inorganic toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit-to-install.