



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

9/27/2013

Mr. Michael Berry
WINE CELLAR INNOVATIONS
4575 Eastern Ave.
Cincinnati, OH 45226

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1431071007
Permit Number: P0115265
Permit Type: Renewal
County: Hamilton

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
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 and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. 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 PTIO 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

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.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 by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 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: SWOAQA



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
WINE CELLAR INNOVATIONS**

Facility ID:	1431071007
Permit Number:	P0115265
Permit Type:	Renewal
Issued:	9/27/2013
Effective:	9/27/2013
Expiration:	9/27/2018



Division of Air Pollution Control
Permit-to-Install and Operate
for
WINE CELLAR INNOVATIONS

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Final Permit-to-Install and Operate
WINE CELLAR INNOVATIONS
Permit Number: P0115265
Facility ID: 1431071007
Effective Date: 9/27/2013

Authorization

Facility ID: 1431071007
Application Number(s): A0048580
Permit Number: P0115265
Permit Description: FEPTIO Renewal for Sawdust Loadout (F001), six dip tanks for wood coating (R001-R006), and three spray booths for surface coating of wood products (K001-K003).
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 9/27/2013
Effective Date: 9/27/2013
Expiration Date: 9/27/2018
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

WINE CELLAR INNOVATIONS
4575 EASTERN AVE
CINCINNATI, OH 45226

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

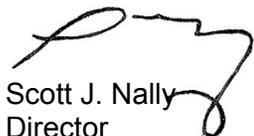
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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: P0115265

Permit Description: FEPTIO Renewal for Sawdust Loadout (F001), six dip tanks for wood coating (R001-R006), and three spray booths for surface coating of wood products (K001-K003).

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

Emissions Unit ID:	F001
Company Equipment ID:	Sawdust Loadout
Superseded Permit Number:	P0098286
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K001
Company Equipment ID:	Paint Spray Booth
Superseded Permit Number:	P0098286
General Permit Category and Type:	Not Applicable

Group Name: Dip Tanks

Emissions Unit ID:	R005
Company Equipment ID:	Dip tank #5
Superseded Permit Number:	P0098287
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R006
Company Equipment ID:	Dip tank #6
Superseded Permit Number:	P0098287
General Permit Category and Type:	Not Applicable

Group Name: Dip Tanks

Emissions Unit ID:	R001
Company Equipment ID:	Wood Coating Dip Tank #1
Superseded Permit Number:	P0098286
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R002
Company Equipment ID:	Wood Coating Dip Tank #2
Superseded Permit Number:	P0098286
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R003
Company Equipment ID:	Wood Coating Dip Tank #3
Superseded Permit Number:	P0098286
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R004
Company Equipment ID:	Wood Coating Dip Tank #4
Superseded Permit Number:	P0098286
General Permit Category and Type:	Not Applicable



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Group Name: Spray Booths

Emissions Unit ID:	K002
Company Equipment ID:	Spray booth
Superseded Permit Number:	P0098287
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Spray booth
Superseded Permit Number:	P0098288
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
WINE CELLAR INNOVATIONS
Permit Number: P0115265
Facility ID: 1431071007
Effective Date: 9/27/2013

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 Southwest Ohio Air Quality Agency 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 submitting¹ 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.

¹Permittees 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.



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WINE CELLAR INNOVATIONS
Permit Number: P0115265
Facility ID: 1431071007
Effective Date: 9/27/2013

B. Facility-Wide Terms and Conditions



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) 2., 3., 4., 5., 6. and 7.
2. The total usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from K001 (Paint Spray Booth 1), K002 (Paint Spray Booth 2), K003 (Paint Spray Booth 3), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4), R005 (Wood Coating Dip Tank 5), R006 (Wood Coating Dip Tank 6) and any registration status and/or permit exempt emissions units, shall not exceed 9.9 TPY* for any single HAP, as a rolling, 12-month summation, and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.
3. The permittee shall collect and record the following information each month for the emissions units identified in term and condition 2.:
 - a) The name and identification number of each coating employed;
 - b) The individual HAP* content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - c) The total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from b)];
 - d) The number of gallons of each coating employed;
 - e) The name and identification number of each cleanup material employed;
 - f) The individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g) The total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
 - h) The number of gallons of each cleanup material employed;



- i) The total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons [for each HAP, the sum of (b) times (d) for all coatings plus the sum of (f) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];
- j) The total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons [the sum of (c) times (d) for all coatings plus the sum of (g) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];
- k) The updated rolling, 12-month summation of usage for each individual HAP**, in tons (this shall include the information for the current month and the preceding eleven calendar months); and
- l) The updated rolling, 12-month summation of usage for the total combined HAPs**, in tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

- 4. The permittee shall notify the Southwest Ohio Air Quality Agency of any exceedance of the HAP emission limitations outlined in B.2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
- 5. The facility-wide total volatile organic compound (VOC) emissions, including emissions units K001 (Paint Spray Booth 1), K002 (Paint Spray Booth 2), K003 (Paint Spray Booth 3), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4), R005 (Wood Coating Dip Tank 5), R006 (Wood Coating Dip Tank 6) and any registration status and/or permit exempt emissions units, shall not exceed 24.9 TPY on a rolling, 12-month summation basis.
- 6. The permittee shall collect and record the following information each month for the emission units identified in term 5.
 - a) The name and identification number of each coating employed;
 - b) The total VOC content in pounds of VOC per gallon of coating, as applied;
 - c) The number of gallons of each coating employed;
 - d) The name and identification number of each cleanup material employed;
 - e) The total VOC content in pounds of VOC per gallon of cleanup material, as applied;
 - f) The number of gallons of each cleanup material employed;



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WINE CELLAR INNOVATIONS

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- g) The total VOC emissions from all coatings and cleanup materials, in pounds or tons [the sum of $b \times c$ for all coatings plus the sum of $e \times f$ for all cleanup materials, divided by 2000 pounds per ton if the units are in tons.
 - h) The updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.
7. The permittee shall notify the Southwest Ohio Air Quality Agency of any exceedance of the facility-wide total VOC emission limitation outlined in 5. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)



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C. Emissions Unit Terms and Conditions



1. F001, Sawdust Loadout

Operations, Property and/or Equipment Description:

Sawdust Loadout

- 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.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) from material handling shall not exceed 1.71 lbs/hour and 5.00 tons/yr. Emissions of particulate matter 10 microns and less (PM10) shall not exceed 0.55 lb/hr and 1.60 tons/yr. See b)(2)c., c)(1) and c)(2). The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B).
b.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity, as a three-minute average, except as specified by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-08(B)	Best available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)c. and c)(2).

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) (BAT) shall be demonstrated by compliance emissions limitations, use of building enclosure and precautionary measure to minimize or eliminate visible emission of particulate matter.
- b. The hourly emission limitations outlined in b)(1) for PE/PM10 are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- c. The permittee shall employ best available control measures for the sawdust loadout for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to employ precautionary measures such as minimizing the drop height and the use of a building enclosure.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is sufficient to satisfy the requirements of IAC rules 3745-17-08 and 3745-31-05(A)(3).

c) Operational Restrictions

- (1) The maximum annual material throughput for this emissions unit shall not exceed 5005 tons of sawdust per year.
- (2) Material loaded onto trucks shall be performed within a building enclosure and the loading drop height shall be minimized sufficient to minimize visible emissions of fugitive dust.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the amount of sawdust unloaded.

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 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.

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:

Particulate emissions (PE) from material handling shall not exceed 1.71 lbs/hour and 5.00 tons/yr.

Applicable Compliance Method:

The hourly emission limitations are based upon the emission unit's potential to emit and the emissions data found in PTI application 14-05643, received October 29, 2004. Compliance with the annual limitations shall be demonstrated by the emission factors in RACM, Table 2-17-1, control efficiencies (if applicable), the operational parameters as submitted in PTIO application A0048580, received August 19, 2013, and the record keeping in d)(1).

Hourly and annual emissions of (PE) shall be calculated by the following equation:

$$A \times B \times 1 \text{ ton}/2000 \text{ lbs}$$

Where,

A = tons sawdust unloaded (hourly or annual)

B = PE emission factor of 2 lbs PE/ ton unloaded (RACM Table 2-17-1)

- b. Emission Limitation:

Emissions of particulate matter less than 10 microns (PM10) shall not exceed 0.55 lb/hr and 1.60 tons/yr.

Applicable Compliance Method:

Hourly and annual emissions of particulate matter less than 10 microns (PM10) shall be calculated by the following equation:

$$A \times B \times C \times 1 \text{ ton}/2000 \text{ lbs}$$

Where,



A = tons sawdust unloaded (hourly or annual)
B = PE emission factor of 2 lbs PE/ ton unloaded (RACM Table 2-17-1)
C = percent of PE less than 10 microns = .321 (AP-42 Appendix B.1, Section 10.5)

(2) Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20% opacity, as a three-minute average, except as specified by rule.

Applicable compliance method:

If required, compliance with the visible emissions limitation for fugitive dust from material handling operations shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

g) Miscellaneous Requirements

(1) None.



2. K001, Paint Spray Booth

Operations, Property and/or Equipment Description:

Paint Spray Booth - 1

- 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. d)(2) and d)(3).
 - (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. b)(1)d.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 40 pounds per day and 3.0 tons per year (TPY). See b)(2)b. and c)(1). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-11(C).
b.	OAC rule 3745-17-11(C)	See c)(1), d)(4)-d)(8).
c.	OAC rule 3745-21-15	Exempt, see section B.5.
d.	OAC rule 3745-31-05(D)	See sections B.2. and B.5.

- (2) Additional Terms and Conditions
 - a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content limitations, usage limitation and emissions limitations.



- b. The VOC content of each coating and cleanup material employed in this emissions unit shall not exceed 5.38 pounds of VOC per gallon, as applied.
- c) Operational Restrictions
 - (1) 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..
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each day for emissions unit K001:
 - a. The company identification for each coating and cleanup material employed;
 - b. The number of gallons of each coating and cleanup material employed;
 - c. The name and identification the VOC content of each coating and cleanup material, in pounds of VOC per gallon of coating or cleanup material; and
 - d. The total VOC emission rate for all coatings and cleanup materials, in pounds of VOC emissions per day [summation of (b) x (c) for all coatings and cleanup materials].

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

These daily VOC emission rate from d. shall be summed annually to demonstrate compliance with the annual VOC emission rate.

- (2) The permit to install for emissions units, K001 and R001-R004, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene
TLV (ug/m3): 434,192
Maximum Hourly Emission Rate (lbs/hr): 2.26
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 301
MAGLC (ug/m3): 10,338



Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and
 - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (3) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.



- (4) 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.
- (5) 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.
- (6) 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.
- (7) 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.

- (8) 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.
- 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 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.



- (3) The permittee shall submit annual reports which specify the total VOC emissions from all the coatings and cleanup materials employed by this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. Submission of the Synthetic Minor Fee Emission report shall satisfy this requirement.

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 Limitations:

VOC emissions from coatings and cleanup materials in this emissions unit shall not exceed 40 pounds per day and 3.0 TPY.

Applicable Compliance Method:

Compliance with the VOC emissions limitations shall be determined by the record keeping requirements specified in d)(1).

- b. Emission Limitation:

5.38 lbs of VOC/gallon, for the coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined by the record keeping requirements specified in terms and conditions d)(1).

- c. Formulation data or USEPA method 24 (for coatings) shall be used to determine the VOC contents of the materials, including cleanup materials, employed in this emissions unit.

g) Miscellaneous Requirements

- (1) None.



3. Emissions Unit Group -Dip Tanks: R005,R006,

EU ID	Operations, Property and/or Equipment Description
R005	Wood Coating Dip Tank - 5
R006	Wood Coating Dip Tank - 3

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. d)(2) and d)(3).

(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. b)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 40 pounds per day from each emission units R005 and R006.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).</p>
b.	OAC rule 3745-17-11(C)	Exempt, per OAC rule 3745-17-11(A)(1)(h).
c.	OAC rule 3745-21-15	Exempt, see section B.5.
d.	OAC rule 3745-31-05(D)	See sections B.2. and B.5.



- (2) Additional Terms and Conditions
 - a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content limitations, usage limitation and emissions limitations.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for each emissions units R005 and R006:
 - a. The company identification for each coating and cleanup material employed;
 - b. The number of gallons of each coating and cleanup material employed;
 - c. The VOC content of each coating and cleanup material, in pounds of VOC per gallon of coating or cleanup material; and
 - d. The total VOC emission rate for all coatings and cleanup materials, in pounds of VOC emissions per day [summation of (b) x (c) for all coatings and cleanup materials].

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

- (2) The permit to install for emissions units, R005 and R006, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 1-Methoxy-2-propanol
TLV (ug/m3): 368,589
Maximum Hourly Emission Rate (lbs/hr): 8
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5311
MAGLC (ug/m3): 8776



Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and
 - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (3) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.



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 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.

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 Limitations:

VOC emissions from coatings and cleanup materials in this emissions unit shall not exceed 40 pounds per day.

Applicable Compliance Method:

Compliance with the VOC emissions limitations shall be determined by the record keeping requirements specified in d)(1).

If required, formulation data or USEPA method 24 (for coatings) shall be used to determine the VOC contents of the materials, including cleanup materials, employed in this emissions unit.

g) Miscellaneous Requirements

- (1) None.



4. Emissions Unit Group -Dip Tanks: R001,R002,R003,R004,

EU ID	Operations, Property and/or Equipment Description
R001	Wood Coating Dip Tank - 1
R002	Wood Coating Dip Tank - 2
R003	Wood Coating Dip Tank - 3
R004	Wood Coating Dip Tank - 4

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. d)(2) and d)(3).

(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. b)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 40 pounds per day and 3.0 tons per year (TPY) from each emission unit R001 through R004. See b)(2)b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-17-11(C)	Exempt, per OAC rule 3745-17-11(A)(1)(h).
c.	OAC rule 3745-21-15	Exempt, see section B.5.
d.	OAC rule 3745-31-05(D)	See sections B.2. and B.5.



(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content limitations, usage limitation and emissions limitations.
- b. The VOC content of each coating and cleanup material employed in this emissions unit shall not exceed 6.48 pounds of VOC per gallon, as applied.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for each emissions units R001 through R004:
- a. The company identification for each coating and cleanup material employed;
 - b. The number of gallons of each coating and cleanup material employed;
 - c. The VOC content of each coating and cleanup material, in pounds of VOC per gallon of coating or cleanup material; and
 - d. The total VOC emission rate for all coatings and cleanup materials, in pounds of VOC emissions per day [summation of (b) x (c) for all coatings and cleanup materials].

These daily VOC emission rate from d shall be summed annually to demonstrate compliance with the annual VOC emission rate.

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

- (2) The permit to install for emissions units, K001 and R001-R004, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Xylene
TLV (ug/m3): 434,192
Maximum Hourly Emission Rate (lbs/hr): 2.26



Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 301
MAGLC (ug/m3): 10,338

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and
 - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (3) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and



- c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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 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.
- (3) The permittee shall submit annual reports which specify the total VOC emissions from all the coatings and cleanup materials employed by this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. Submission of the Synthetic Minor Fee Emission report shall satisfy this requirement.

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 Limitations:

VOC emissions from coatings and cleanup materials in this emissions unit shall not exceed 40 pounds per day and 3.0 TPY.

Applicable Compliance Method:

Compliance with the VOC emissions limitations shall be determined by the record keeping requirements specified in d)(1).

b. Emission Limitation:

6.48 lbs of VOC/gallon, for the coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the VOC content limitation shall be determined by the record keeping requirements specified in terms and conditions d)(1).

- c. Formulation data or USEPA method 24 (for coatings) shall be used to determine the VOC contents of the materials, including cleanup materials, employed in this emissions unit.



Final Permit-to-Install and Operate
WINE CELLAR INNOVATIONS
Permit Number: P0115265
Facility ID: 1431071007
Effective Date: 9/27/2013

g) Miscellaneous Requirements

- (1) None.



5. Emissions Unit Group -Spray Booths: K002,K003,

EU ID	Operations, Property and/or Equipment Description
K002	Paint spray booth 2
K003	Paint spray booth 3

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. d)(2) and d)(3).

(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. b)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions shall not exceed 40 pounds per day. See c)(1). The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D) and 3745-17-11(C).
b.	OAC rule 3745-17-11(C)	See c)(1), d)(4)-d)(8).
c.	OAC rule 3745-21-15	Exempt, see Section B.5.
d.	OAC rule 3745-31-05(D)	See B.2. and B.5..



(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the VOC content limitations, usage limitation and emissions limitations.

c) Operational Restrictions

- (1) 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..

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for emissions unit K002 and K003:

- a. The company identification for each coating and cleanup material employed;
- b. The number of gallons of each coating and cleanup material employed;
- c. The VOC content of each coating and cleanup material, in pounds of VOC per gallon of coating or cleanup material, and
- d. The total VOC emission rate for all coatings and cleanup materials, in pounds of VOC emissions per day [summation of (b) x (c) for all coatings and cleanup materials];

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

- (2) The permit to install for emissions units K002 and K003 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: 2-Butoxyethanol
TLV (ug/m3): 96,663
Maximum Allowable Hourly Emission Rate (lbs/hr): 0.48
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 316
MAGLC (ug/m3): 2301



Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled: and
 - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (3) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and



- c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
- (4) 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.
- (5) 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.
- (6) 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.
- (7) 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.
- (8) 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.
- 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 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.

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 Limitations:

VOC emissions from coatings and cleanup materials in this emissions unit shall not exceed 40 pounds per day.

Applicable Compliance Method:

Compliance with the VOC emissions limitations shall be determined by the record keeping requirements specified in d)(1).

If required, formulation data or USEPA method 24 (for coatings) shall be used to determine the VOC contents of the materials, including cleanup materials, employed in this emissions unit.

g) Miscellaneous Requirements

- (1) None.