



10/28/2013

Certified Mail

Jeff Martin
THE WILL-BURT COMPANY (PLANT 2000)
401 COLLINS BLVD.
PO BOX 900
ORRVILLE, OH 44667

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0285010310
Permit Number: P0106516
Permit Type: Renewal
County: Wayne

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 Ohio EPA DAPC, Northeast District Office at (330)425-9171 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: Ohio EPA-NEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
THE WILL-BURT COMPANY (PLANT 2000)**

Facility ID:	0285010310
Permit Number:	P0106516
Permit Type:	Renewal
Issued:	10/28/2013
Effective:	10/28/2013
Expiration:	10/28/2023



Division of Air Pollution Control
Permit-to-Install and Operate
for
THE WILL-BURT COMPANY (PLANT 2000)

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Final Permit-to-Install and Operate
THE WILL-BURT COMPANY (PLANT 2000)
Permit Number: P0106516
Facility ID: 0285010310
Effective Date: 10/28/2013

Authorization

Facility ID: 0285010310
Application Number(s): A0039766
Permit Number: P0106516
Permit Description: Administrative modification due to rule OAC rule 3745-21-07(G) no longer being applicable and renewal PTIO for emissions units R002 and R003. Coating operations no longer apply to R003 only sanding/grinding at de minimis levels.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 10/28/2013
Effective Date: 10/28/2013
Expiration Date: 10/28/2023
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

THE WILL-BURT COMPANY (PLANT 2000)
401 COLLINS BLVD.
PO BOX 900
ORRVILLE, OH 44667

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

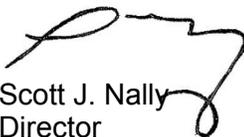
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally
Director



Final Permit-to-Install and Operate
THE WILL-BURT COMPANY (PLANT 2000)
Permit Number: P0106516
Facility ID: 0285010310
Effective Date: 10/28/2013

Authorization (continued)

Permit Number: P0106516

Permit Description: Administrative modification due to rule OAC rule 3745-21-07(G) no longer being applicable and renewal PTIO for emissions units R002 and R003. Coating operations no longer apply to R003 only sanding/grinding at de minimis levels.

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

Emissions Unit ID:	R002
Company Equipment ID:	Paint Booth
Superseded Permit Number:	02-18667
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
THE WILL-BURT COMPANY (PLANT 2000)
Permit Number: P0106516
Facility ID: 0285010310
Effective Date: 10/28/2013

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. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. 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 of this permit 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 [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting 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 emission 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.



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.



Final Permit-to-Install and Operate
THE WILL-BURT COMPANY (PLANT 2000)
Permit Number: P0106516
Facility ID: 0285010310
Effective Date: 10/28/2013

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) None



Final Permit-to-Install and Operate
THE WILL-BURT COMPANY (PLANT 2000)
Permit Number: P0106516
Facility ID: 0285010310
Effective Date: 10/28/2013

C. Emissions Unit Terms and Conditions



1. R002, Paint Booth

Operations, Property and/or Equipment Description:

Paint Line No. 2 (two paint booths with dry exhaust filters and multiple spray guns)

- 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)(11) – d)(13) and e)(2).
 - (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)	VOC emissions shall be less than 15 pounds per day when coating metal furniture. See b)(2)a. Maximum coating usage shall not exceed 10 gallons per day when coating miscellaneous metal parts. VOC emissions from this emissions unit shall not exceed 58.1 pounds per day and 11.2 tons per year. Visible emissions (VE) shall not exceed 5% opacity, as a six-minute average, except as provided by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Particulate emissions (PE) from this emissions unit shall not exceed 0.551 lb per hour and 2.4 tons per year.
b.	OAC rule 3745-21-09(I)(3)(a)	See b)(2)b.
c.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)c.
d.	OAC rule 3745-17-07(A)(1)	The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-11(C)	See b)(2)d, c)(1) and c)(2).
f.	40 CFR Part 60, Subpart EE	See b)(2)e.

(2) Additional Terms and Conditions

- a. The VOC emissions limitation of less than 15 pounds per day when coating metal furniture is for all metal furniture coating lines at the facility.
- b. OAC rule 3745-21-09 (I)(3)(a) states that the requirements of OAC rule 3745-21-09(I)(1) shall not apply if all prime coat, topcoat, or single coat coating lines for metal furniture, in combination, at the facility emit less than 15 lbs of VOC per day.
- c. OAC rule 3745-21-09(U)(2)(e)(iii) states that the requirement of OAC rule 3745-21-09(U)(1) shall not apply when coating miscellaneous metal parts when no more than ten gallons are used per day.
- d. The permittee shall operate the dry particulate filter system, associated with this emissions unit, whenever the emissions unit is in operation.
- e. If the permittee uses less than 3,842 liters (1,015 gallons) of metal furniture coatings (as applied) per calendar year and keeps purchase or inventory records or other data necessary to substantiate annual coating usage, the permittee shall be exempt from all other provisions of 40 CFR Part 60.313, Subpart EE.

If the permittee uses more than 3,842 liters (1,015 gallons) of metal furniture coatings (as applied) per calendar year and thereafter the permittee shall emit no more than 0.90 kilogram of VOC per liter (7.5 pounds of VOC per gallon) of coating solids applied, based on a monthly volume-weighted average.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever these emissions units are 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.



- (2) 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 collect and record the following information each day for this emissions unit:
 - 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 per gallon; and
 - d. the total VOC emissions rate for all coatings and all cleanup materials, in pounds per day.
- (2) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the total volume of all coatings and all cleanup materials employed, in gallons per month; and
 - b. the total emissions for all coatings and all cleanup materials of all VOCs, in tons per month.
- (3) The permittee shall collect and record the following information each day when coating metal furniture for this emissions unit:
 - 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 per gallon; and
 - d. the total VOC emissions rate for all coatings and all cleanup materials, in pounds per day.
- (4) The permittee shall collect and record the following information each day when coating miscellaneous metal parts for this emissions unit:
 - a. the company identification for each coating employed; and
 - b. the number of gallons of each coating employed.
- (5) The permittee shall calculate and record the total annual VOC emissions from this emissions unit, i.e., the sum of the daily VOC emission rates from the coating and cleanup materials for the calendar year.



- (6) If the permittee uses more than 3,842 liters (1,015 gallons) of metal furniture coatings per year, during that year and thereafter if the permittee uses a non-complying coating during any month, the permittee shall maintain the following monthly records for all the metal furniture coatings:
- a. the identification of each coating;
 - b. the volume of each coating consumed, as received (liters) [B];
 - c. the density of each coating, as received (kilograms per liter)[C];
 - d. the proportion of VOC in each coating, as received (fraction by weight) [D];
 - e. the volume of each VOC-solvent diluent added to each coating (liter) [E];
 - f. the density of each diluent VOC-solvent (kilograms per liter) [F];
 - g. the mass of VOC used during each month [G], i.e., $G = (B_i)(C_i)(D_i) + \dots + (B_n)(C_n)(D_n) + (E_i)(F_i) + \dots + (E_n)(F_n)$, where: n = the total number of surface coatings employed in the emissions unit during the month; and i = subscript denoting a specific coating employed;
 - h. the proportion of solids in each coating, as received (fraction by volume) [H];
 - i. the total volume of coating solids used in each calendar month [I]; i.e., $I = (B_i)(H_i) + \dots + (B_n)(H_n)$;
 - j. the transfer efficiency (fraction) [J] as specified in Table 1 of 40 CFR 60.313, Subpart EE; and
 - k. the average VOC emissions per unit volume of coating solids applied [K]; i.e., $K = G/(I)(J)$.
- (7) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.



If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (8) The permittee shall conduct periodic inspections of the dry filtration system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, and/or operating manual and/or in accordance with any documented modifications deemed necessary by the permittee. The inspection frequency shall be based upon the recommendation of the manufacturer.
- (9) In addition to the recommended periodic inspections, the permittee shall conduct a comprehensive inspection of the dry filtration system at least once per year while the coating operations are shut down and shall perform any needed maintenance and repair.
- (10) The permittee shall maintain the following information for the dry filtration system:
 - a. documentation of the manufacturer's recommendations, instructions, or operating manual, along with documentation of any modifications deemed necessary by the permittee;
 - b. any period(s) of time when the dry filtration system was not in service when the emissions unit was in operation;
 - c. any period(s) of time (during coating operations) when the dry filtration system was not operating according to the manufacturer's recommendations and/or according to documented modifications to the manufacturer's recommendations deemed necessary by the permittee; and
 - d. records for each inspection (periodic and annual) of the dry filtration system to include 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 the date; and
 - d. the name of person who performed the inspection.



The manufacturer's operation manual, along with any documented modifications determined necessary by the permittee, shall be maintained at the facility at all times. Records of malfunction, maintenance, and inspections of the dry filtration system shall be maintained for a period of not less than five years from the date of record and shall be made available to the Ohio EPA upon request.

- (11) The permit to install and operate (PTIO) application for PTIO P0106516 for emissions unit R002, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC 3704.03(F), was applied to these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application (PTI 02-18667); and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - a. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices[]; or
 - b. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., X hours per day and Y days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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



- d. The following table summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or worst case toxic contaminant(s):

Compound	TLV (ug/m ³)	MAGLC = (ug/m ³)	Emission Rate (grams/sec)	Predicted 1-hr MAGLC (ug/m ³)	MAGLC Exceeded (Y/N)
Acetone	1,187,117	28,265	0.1595	42	N
Cyclohexanone	80,278	1,911	0.1330	35	N
Methyl n-amyl ketone	233,497	5,560	0.1543	41	N
2-propanol	491,534	11,703	0.2573	68	N
1-methoxy-2- Propanol	368,589	8,776	0.2102	55	N
n-butyl acetate	712,638	16,968	0.0893	24	N
Toluene	188,405	4,486	0.0644	17	N
Xylene	434,192	10,338	0.0873	23	N
Isopropyl acetate	417,710	9,946	0.0687	18	N
Methyl ethyl ketone	589,775	14,042	0.0868	23	N

Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- e. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- f. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- g. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute 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 a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the



change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (12) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (13) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall notify Ohio EPA's Northeast District Office in writing of any daily record showing the following:
- a. the dry particulate filter not employed during all periods of coating application to control particulate emissions;
 - b. VOC emissions more than 15 pounds per day when coating metal furniture; and
 - c. Maximum coating usage more than 10 gallons per day when coating miscellaneous metal parts; and
 - d. VOC emissions more than 58.1 pounds per day.



The notification shall include a copy of such record and shall be sent to Ohio EPA's Northeast District Office within 45 days after the exceedance occurs.

- (2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
 - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to Ohio EPA's Northeast District Office 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
 - (4) The annual compliance reports shall include:
 - a. a statement as to whether the coating operation was in compliance with each of the listed applicable rules and requirements, including whether the records of the coating and cleanup material usage demonstrated that annual emissions, as calculated in d)(5), did not exceed the ton per year VOC limit;
 - b. identification of any period of time (date and number of hours) when the dry filtration system was not in service or was not operating in accordance with the manufacturer's or permittee's documented instructions during coating operations; and
 - c. specify the amount of metal furniture coatings used during each calendar year (i.e., January 1 through December 31). The report may include purchase or inventory records or other data necessary to document the annual metal furniture coating usage. The annual reports shall be submitted by January 31 of each year for the previous calendar year.
 - (5) If the permittee uses more than 3,842 liters of metal furniture coatings (as applied) per year, the permittee shall notify the Director (the Ohio EPA, Northeast District Office) in writing of this and shall document any exceedances of Subpart EE during that year and any subsequent months. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Northeast District Office) within 45 calendar days after the exceedance occurs.
- 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:

The VOC emissions shall not exceed 58.1 pounds per day from the coating booth and cleanup materials usage.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1)d.

b. Emissions Limitation:

The VOC emissions shall be less than 15 pounds per day when coating metal furniture.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the recordkeeping requirements specified in d)(3)d.

c. Emission Limitation:

Maximum coating usage shall not exceed 10 gallons per day when coating miscellaneous metal parts.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(4)b.

d. Emission Limitation:

The VOC emissions from coatings and cleanup materials usage shall not exceed 11.2 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated by the summation of the monthly VOC emissions for the calendar year, based upon the record keeping requirements specified in d)(5).

e. Emission Limitation:

Visible emissions (VE) shall not exceed 5% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined based upon visible emission observations performed in accordance with Method 9, as set forth in 40 CFR Part 60, Appendix A.



f. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.551 lb per hour and 2.4 tons per year.

Applicable Compliance Method:

If required, compliance with the hourly emission limit shall be determined through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limit may be established by multiplying the hourly emission limit (0.551 lb/hr) by 8,760 hours of operation per year and dividing by 2,000 to convert to ton(s). Therefore, compliance with the annual emission limit shall be assumed if compliance with the hourly emission limit is maintained.

g) Miscellaneous Requirements

- (1) None.