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

12/17/2013

Certified Mail

Mr. Michael Luffy
Decorative Panels International Inc
2900 Hill Avenue
Toledo, OH 43607-2929

Facility ID: 0448011193
Permit Number: P0107147
County: Lucas

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 11/13/2013. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Toledo Department of Environmental Services

Response to Comments

Facility ID:	0448011193
Facility Name:	Decorative Panels International Inc
Facility Description:	wall board manufacturer
Facility Address:	2900 Hill Avenue Toledo, OH 43607-2929 Lucas County
Permit:	P0107147, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Toledo Blade on 11/14/2013. The comment period ended on 12/14/2013.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

a. Comment: None

b. Response: None

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Decorative Panels International Inc

Facility ID:	0448011193
Permit Number:	P0107147
Permit Type:	Renewal
Issued:	12/17/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Decorative Panels International Inc

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Authorization

Facility ID:	0448011193
Facility Description:	wall board manufacturer
Application Number(s):	A0039536, A0039794, A0039959, A0040650, A0040889, A0042972
Permit Number:	P0107147
Permit Description:	wall board manufacturer
Permit Type:	Renewal
Issue Date:	12/17/2013
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0088158

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Decorative Panels International Inc
2900 Hill Avenue
Toledo, OH 43607-2929

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

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Toledo Department of Environmental Services. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Toledo Department of Environmental Services. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Toledo Department of Environmental Services by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Toledo Department of Environmental Services unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

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

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Toledo Department of Environmental Services concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Toledo Department of Environmental Services) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Toledo Department of Environmental Services with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Toledo Department of Environmental Services as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.

This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11)))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theToledo Department of Environmental Services.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Toledo Department of Environmental Services. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention RequirementsUnder State Law Only

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Toledo Department of Environmental Services in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Toledo Department of Environmental Services must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Toledo Department of Environmental Services, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) B.4.

2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subparts A and QQQQ: K001. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gov or by contacting the Toledo Division of Environmental Services.

3. The following insignificant emission units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emission unit. The insignificant emission units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21.

   a) None.

   [Authority for Term: OAC rule 3745-77-07(A)(13)]

4. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

   a) Z001 – laminating line; and

   b) Z002 – QC laboratory.

C. Emissions Unit Terms and Conditions

1. K001, Finishing Line

Operations, Property and/or Equipment Description:

hardboard finishing line with eight thermal incinerators

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(2).

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) (PTI 04-204, as modified 4/5/2005)	See b)(2)a. through b)(2)c.
b.	OAC rules 3745-31-21 through 27	Emissions of VOC shall not exceed 3.29 pounds per gallon of applied coating solids. Emissions of VOC shall not exceed 90 tons per rolling, 3-month period.
c.	OAC rule 3745-21-07(M)(2)	See b)(2)d. and b)(2)e.
d.	40 CFR Part 63, Subpart A (40 CFR 63.1 through 63.16)	Table 4 to Subpart QQQQ of 40 CFR Part 63 – Applicability of General Provisions to Subpart QQQQ provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
e.	40 CFR Part 63, Subpart QQQQ (40 CFR 63.4680 through 63.4781) [In accordance with 40 CFR 63.4681(a)(3), this emissions unit is an existing interior wall paneling and tileboard coating operation that uses more than 1,100 gallons of coatings per year and is a major source of HAPs.]	In accordance with 40 CFR 63.4690(b) and Table 2 to Subpart QQQQ of 40 CFR Part 63 – Emissions Limits for Existing Affected Sources, the emissions of hazardous air pollutants (HAPs) shall not exceed 183 grams per liter (1.53 pounds per gallon) of coating solids determined in accordance with 63.4690.
f.	40 CFR Part 64 (64.1 through 64.10)	The permittee shall implement a compliance assurance monitoring (CAM) program of monitoring, recordkeeping,

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 64.2, this emissions unit is located at a Title V facility, is subject to a VOC emission limitation, uses a VOC control device to achieve compliance and has potential pre-control emissions of greater than 100 tons VOC per year]	and work practice standards consistent with the provisions of this permit.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-21 thru 27.

b. During any time which a thermal incinerator is utilized to comply with the VOC emissions limitations, all of the VOC emissions from the affected coating station(s) shall be vented to an associated thermal oxidizer(s) that shall meet the operational, monitoring, and record keeping requirements of this permit, whenever the affected coating station is in operation.

c. In order to maintain compliance with the applicable VOC emission limitation(s) contained in this permit, the acceptable 3-hour average combustion temperature within a thermal oxidizer, for any 3-hour block of time when the coating station controlled by the thermal oxidizer is in operation, shall not be more than 50 degrees Fahrenheit below the 3-hour average temperature measured during the most recent performance test that demonstrated the emissions unit was compliance.

d. Ohio EPA made an error when preparing OAC 3745-21-07(M) rule. Ohio EPA intended to carry forward the exemption from the requirement to control emissions that was previously provided to this emissions unit by OAC rule 3745-21-07(G)(9)(c) into the new OAC rule 3745-21-07(M)(5)(d) rule. Ohio EPA is in the process of correcting OAC rule 3745-21-07(M)(5)(d) to also exempt the air contaminant sources identified under OAC rule 3745-21-07(M)(1) from the requirement to control emissions under OAC rule 3745-21-07(M)(2) when applying coatings that meet the requirements of OAC rule 3745-21-07(M)(5)(d).

Until such time that US EPA approves a revised exemption under OAC rule 3745-21-07(M)(5)(d), Ohio EPA is not mandating that this emission unit comply with the requirements pursuant to OAC rule 3745-21-07(M)(2) on any day when:

i. all coatings applied comply with the requirements of OAC rule 3745-21-07(M)(5)(d); and

ii. the VOC emissions from this emissions unit do not exceed 3.29 pounds per gallon of applied coating solids.

e. On any day that coatings are applied that do not comply with the restrictions identified in b)(2)d. above, the permittee shall equip each coating operation of this emissions unit with a control system (capture and control equipment) that reduces the organic compound emissions by an overall control efficiency of at least eight-five percent, by weight. If the reductions are achieved by incineration, ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

c) Operational Restrictions

(1) The maximum coating usage for this emissions unit shall not exceed 54,700 gallons of applied coating solids, based upon a rolling, 3-month summation of the coating usage figures.

(Authority for term: OAC rule 3745-77-07(A)(1) and PTI 04-00204, modified 4/5/2005)

(2) Except where employing only compliant materials, all of the VOC emissions from this emissions unit shall be vented to a thermal incinerator that shall meet the operational, monitoring, and record keeping requirements of this permit, when the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(A)(1))

(3) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 63, Subpart QQQQ - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products, including the following sections:

63.4691(a) – (c)	Operational restrictions for compliant material option, emission rate without add-on controls option, and emission rate with add-on controls option.
63.4692(a)	Exemption from operating limits for compliant materials or emission rate without add-on controls.
63.4692(b)	Operational limits for controlled coating operations on which you use the emission rate with add-on controls option.
63.4693(a)	Exemption from work practice standards for compliant material option or emission rate without add-on controls option.
63.4693(b)	Work practice standards for the emission rate with add-on controls option.
63.4693(c)	An existing documented plan that incorporates steps to minimize emissions from sources specified in 63.4693(b)(1)-(b)(5) can be used in place of a work practice plan as specified in 63.4693(b).
63.4700(a), (b)	General compliance requirements for emissions limits, operational limits, and maintenance requirements for all compliance options.

(Authority for term: OAC rule 3745-77-07(C)(1))

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information monthly for all coating station(s) for each period of time during which the associated thermal incinerator was not in use as a control device:

a. the company identification for each thermal incinerator which was not in use as a control device;

b. the date and time period during which each thermal incinerator was not in use as a control device;

c. the company identification of each coating and cleanup material employed;

d. the VOC content of each cleanup material, in pounds per gallon;

e. the number of gallons of each cleanup material employed;

f. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

g. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;

h. the total VOC emissions for each period of time, in tons; and

i. the total volume of solids applied for each period of time, in gallons.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-204)

(2) The permittee shall collect and record the following information monthly for all coating station(s) for each period of time during which the associated thermal incinerator was in use as a control device:

a. the company identification for each thermal incinerator which was in use;

b. the total time, in hours, during which each thermal incinerator was in use as a control device, cumulating from the completion of the most recent emission test which demonstrated compliance with the emission limitations;

c. the company identification for each coating and cleanup material employed;

d. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

e. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;

f. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied. The controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph e. above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;

g. the number of gallons of each cleanup material employed;

h. the VOC content of each cleanup material, in pounds per gallon;

i. the total controlled VOC emissions, in tons; and

j. the total volume of solids applied for each period of time, in gallons.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) The permittee shall collect and record the following information each month:

a. the total of the uncontrolled and controlled VOC emissions, i.e., the sum of (1)h. plus (2)i. for all time periods, in tons;

b. the total of the uncontrolled and controlled VOC emissions, in tons, as a rolling, 3-month summation;

c. the coating usage, i.e., the sum of (1)i. plus (2)j. for all time periods, in gallons of applied coating solids;

d. the pounds per gallon solids usage, i.e., the sum of (3)a. divided by (3)c., in pounds per gallon of applied coating solids; and

e. the rolling, 3-month summation of the coating usage, in gallons of applied coating solids.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) In accordance with the requirements of 40 CFR Part 64, the permittee shall properly operate, and maintain a continuous temperature monitor and recorder that measures and records the combustion temperature within the thermal oxidizer when the associated coating station is in operation, including periods of startup and shutdown.

The permittee shall collect and record the following information for each thermal oxidizer that is utilized to demonstrate compliance with the VOC limitation contained in this permit:

a. all 3-hour blocks of time, when the coating station(s) controlled by the thermal oxidizer was/were in operation, during which the 3-hour average combustion temperature within the thermal oxidizer was more than 50 degrees Fahrenheit below the 3-hour average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance;

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s); and

c. a log (date and total time) of the downtime or bypass of the capture (collection) system and thermal oxidizer, and/or downtime of the monitoring equipment, when the associated coating station(s) was/were in operation.

(Authority for term: 40 CFR Part 64, CAM and OAC rule 3745-77-07(C)(1))

(5) In accordance with the requirements of 40 CFR Part 64, whenever the monitored 3-hour average combustion temperature within the thermal oxidizer deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the temperature readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: 40 CFR Part 64, CAM and OAC rule 3745-77-07(C)(1))

(6) In accordance with the requirements of 40 CFR Part 64, for each thermal incinerator utilized to comply with the VOC emissions limitations, the permittee shall:

a. install a gas temperature monitor in the firebox of the thermal oxidizer or in the duct immediately downstream of the firebox before any substantial heat exchange occurs;

b. locate the temperature sensor in a position that provides a representative temperature;

c. use a temperature sensor with a measurement sensitivity of 4 degrees Fahrenheit or 0.75 percent of the temperature value, whichever is larger;

d. shield the temperature sensor system from electromagnetic interference and chemical contaminants;

e. if used, install a gas temperature chart recorder with a measurement sensitivity in the minor division of at least 20 degrees Fahrenheit;

f. perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owner's manual. Following the electronic calibration, the permittee shall conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30 degrees Fahrenheit of the process temperature sensor reading.

g. conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor; and

h. at least monthly, inspect components for integrity and electrical connections for continuity, oxidation, and galvanic corrosion.

(Authority for term: 40 CFR Part 64, CAM and OAC rule 3745-77-07(C)(1))

(7) In accordance with the requirements of 40 CFR Part 64, the permittee shall properly operate and maintain a device that monitors the gas volumetric flow rate in each duct between the capture device and the add-on control device (thermal oxidizer) when the associated coating station is in operation, including periods of startup and shutdown.

The permittee shall collect and record the following information for each device that monitors the gas volumetric flow rate:

a. all 3-hour blocks of time, when the coating station(s) controlled by thermal oxidizer was/were in operation, during which the 3-hour average gas volumetric flow rate in each duct between a capture device and add-on control device inlet was below the 3-hour average volumetric flow rate established during the most recent performance test that demonstrated the emission unit(s) was/were in compliance;

b. a log or record of the operating time for the capture (collection) system, thermal oxidizer, monitoring equipment, and the associated emissions unit(s); and

c. a log (date and total time) of the downtime of the device that monitors the gas volumetric flow rate in each duct between the capture device and the add-on control device (thermal oxidizer).

(Authority for term: 40 CFR Part 64, CAM and OAC rule 3745-77-07(C)(1))

(8) In accordance with the requirements of 40 CFR Part 64, whenever the monitored 3-hour average gas volumetric flow rate in each duct between the capture device and the add-on control device (thermal oxidizer) deviates from the range or limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation within the acceptable range/limit specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the gas volumetric flow rate readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: 40 CFR Part 64, CAM and OAC rule 3745-77-07(C)(1))

(9) In accordance with the requirements of 40 CFR Part 64, for each temperature monitoring or velocity system (continuous parametric monitoring system (CPMS)) utilized to comply with the VOC emissions limitations:

a. the CPMS must complete a minimum of one cycle of operation for each successive 15-minute period. The permittee shall have a minimum of four equally spaced successive cycles of CPMS operation in 1 hour;

b. the permittee shall determine the 3-hour average of all recorded readings for each successive 3-hour period of the emission capture system and add-on control device operation;

c. the permittee shall record the results of each inspection, calibration, and validation check of the CPMS;

d. the permittee shall maintain the CPMS at all times and have available necessary parts for routine repairs of the monitoring equipment;

e. the permittee shall operate the CPMS and collect emission capture system and add-on control device parameter data at all times that a controlled coating operation is operating, except during monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, if applicable, calibration checks and required zero and span adjustments); and

f. thepermittee shall not use emission capture system or add-on control device parameter data recorded during periods when the control device is not receiving emissions, monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities when calculating data averages. The permittee shall use all the data collected during all other periods in calculating the data averages for determining compliance with the emission capture system and add-on control device operating limits.

Note: a monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the CPMS to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available for required calculations is a deviation from the monitoring requirements.

(Authority for term: 40 CFR Part 64, CAM and OAC rule 3745-77-07(C)(1))

(10) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: 40 CFR Part 64, CAM and OAC rule 3745-77-07(C)(1))

(11) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 63, Subpart QQQQ - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products, including the following sections:

63.4730(a)	Record keeping for notifications and reports.
63.4730(b)	Record keeping for manufacturer's formulation data or supplier documentation.
63.4730(c)	Record keeping for coating operations.
63.4730(d)-(h), (j)	Record keeping for coating, thinner, and cleaning material including mass fraction organic HAPs, volume fraction coating solids, density, deviations, and treatment, storage and disposal.
63.4730(k)	Record keeping for the emission rate with add-on controls option.
63.4731(a)-(c)	Record keeping format and length of retention.
63.4742(a)-(d); 63.4752(a)-(d)	Monitoring and recordkeeping continuous compliance determination.
63.4763(a)-(j)	Demonstration of continuous compliance with the applicable emissions limitation.
63.4768	Requirements for continuous parameter monitoring system, installation, operation, and maintenance.

(Authority for term: 40 CFR Part 64, CAM and OAC rule 3745-77-07(C)(1))

(12) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 04-204 as modified April 5, 2005: d)(1) through d)(10). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries of the following records for all coating station(s) for each period of time during which the associated thermal incinerator was in use as a control device:

a. Each period of time (start time and date, and end time and date) when the 3-hour average combustion temperature within the thermal incinerator was more than 50 degrees Fahrenheit below the 3-hour average temperature measured during the most recent performance test that demonstrated the emissions unit(s) was/were in compliance.

b. Any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the thermal incinerator;

c. Any period of time (start time and date, and end time and date) when the 3-hour average gas volumetric flow gas in each duct was not at least the 3-hour average volumetric flow rate established in the most recent stack test;

d. Each incident of deviation described in (a), (b) or (c) (above) where a prompt investigation was not conducted;

e. Each incident of deviation described in (a), (b) or (c) where prompt corrective action, that would bring the emissions unit into compliance and/or the temperature within the thermal incinerator into compliance with the acceptable range, was determined to be necessary and was not taken; and

f. Each incident of deviation described in (a), (b) or (c) where proper records were not maintained for the investigation and/or the corrective action(s).

(Authority for term: 40 CFR Part 64, CAM, OAC rule 3745-77-07(C)(1) and PTI 04-00204, modified 4/5/2005)

(2) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when the VOC emissions did not comply with the allowable limitation of 3.29 pounds of VOC per gallon of applied coating solids.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-00204, modified 4/5/2005)

(3) The permittee shall submit quarterly deviation (excursion) reports that identify all months during which the rolling, 3-month coating usage did not comply with the allowable limitation of 54,700 gallons of applied coating solids.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(4) The permittee shall submit quarterly emission deviation (excursion) reports that identify all months during which the VOC emissions did not comply with the allowable limitation of 90 tons of VOC per rolling, 3-month period.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-00204, modified 4/5/2005)

(5) The permittee shall submit quarterly summary reports that identify the total time, in hours, during which each thermal incinerator was in use as a control device, cumulating from the completion of the most recent emission test which demonstrated compliance with the emission limitations.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-77-07(A)(3)(c))

(6) The reports contained in this permit shall be submitted in accordance with the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(7) The permittee shall submit semiannual reports and other such notifications and reports via the air services component of the Ohio EPA's eBusiness Center as are required pursuant to 40 CFR Part 63, Subpart QQQQ - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products, including the following sections:

63.9(j); 63.4710	Any change to the information contained in the notification of compliance status shall be provided to the Administrator within 15 days after the change.
63.4720(a)-(c)	Semiannual reports.

(Authority for term: OAC rule 3745-77-07(C)(1))

(8) Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 04-204 as modified April 5, 2005: e)(1) and e)(7). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

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:

3.29 pounds of VOC per gallon of applied coating solids

Applicable Compliance Method:

Compliance shall be demonstrated through the required record keeping specified in d). The overall control efficiency used shall be the efficiency determined during the most recent emission test which demonstrated compliance. Coating VOC concentrations shall be determined in accordance with USEPA Methods 24 and 24A using the methods and procedures specified in 40 CFR Part 63.4741, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-00204, modified 4/5/2005)

b. Emission Limitation:

90 tons of VOC per rolling, 3-month period

Applicable Compliance Method:

Compliance shall be demonstrated through the required record keeping specified in d)(3).

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-00204, modified 4/5/2005)

c. Emission Limitation:

reduce the overall emissions of organic materials by at least eighty-five per cent

Applicable Compliance Method:

Compliance shall be demonstrated through the required record keeping specified in d). Capture and control efficiency shall be determined in accordance with USEPA Methods 1 through 4, 25 or 25A, and Methods 204 through 204F using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used upon approval by the Toledo Division of Environmental Services.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-00204, modified 4/5/2005)

d. reduce the emissions of organic material by incineration, provided that ninety per cent or more of the carbon in the organic material being incinerated is oxidized to carbon dioxide

Applicable Compliance Method:

Compliance shall be demonstrated through the required record keeping specified in d). Control efficiency shall be determined in accordance with USEPA Methods 25 or 25A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used upon approval by the Toledo Division of Environmental Services.

(Authority for term: OAC rule 3745-77-07(C)(1) and PTI 04-00204, modified 4/5/2005)

e. mission Limitation:

1.53 pounds HAPs per gallon of coating solids

Applicable Compliance Method:

Compliance shall be demonstrated through the required record keeping specified in d). Coating HAP concentrations shall be determined in accordance with 40 CFR Part 63.4742, 40 CFR Part 63.4752, or 40 CFR 63.4763.

(Authority for term: OAC rule 3745-77-07(C)(1))

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. Emission testing for the overall control efficiency of each incinerator shall be conducted every 2.5 years, or after every 10,000 hours (approximate) of operation, whichever is less stringent. If the applicable incinerator has not been tested in the previous 10,000 hours of operation as a control device, and the incinerator is utilized as a control device for a period of 30 consecutive days, the permittee shall perform emission testing on that incinerator within 60 days.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

b. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with 40 CFR Part 63.4766 and the test methods and procedures specified in OAC rule 3745-21-10(C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. Capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. The permittee shall collect and record the 3-hour average combustion temperature within the thermal incinerator and the 3-hour average gas volumetric flow rate during testing.

e. The permitee shall collect and record monitoring parameters (temperature and gas volumetric flow rate) established to demonstrate that the emissions unit is in compliance with the capture efficiency requirement when the incinerator is in operation as a control device for VOC compliance purposes.

f. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Toledo Division of Environmental Service's refusal to accept the results of the emission test(s).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

h. Personnel from the Toledo Division of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

i. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Toledo Division of Environmental Services.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(3) If the permittee chooses to comply with 40 CFR Part 63, Subpart QQQQ using the emission rate with add-on controls option, then the permittee shall comply with the testing and compliance with the applicable requirements specified under 40 CFR 63.4760, 63.4761, 63.4763, 63.4764, 63.4765, 63.4766, and 63.4767.

(Authority for term: OAC rule 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) Coating formulation changes can be made by the permittee provided the emission limitations of this permit are not exceeded.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) Should any coating formulations or process changes cause an increase in the quantity or intensity of odors emitted from this facility in violation of OAC rule 3745-15-07, as determined by the Toledo Division of Environmental Services, the company shall take corrective action to reduce the impact of the odors. The time schedule for the corrective action shall be approved by the Toledo Division of Environmental Services.

(Authority for term: PTI 04-00204, modified 4/5/2005)