



1/6/2014

Certified Mail

Dan Mast
Valley View Oak, LLC
8211 Township Road 652
Millersburg, OH 44654

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0238000194
Permit Number: P0115961
Permit Type: Renewal
County: Holmes

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
Valley View Oak, LLC**

Facility ID:	0238000194
Permit Number:	P0115961
Permit Type:	Renewal
Issued:	1/6/2014
Effective:	1/6/2014
Expiration:	1/6/2019



Division of Air Pollution Control
Permit-to-Install and Operate
for
Valley View Oak, LLC

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Final Permit-to-Install and Operate
Valley View Oak, LLC
Permit Number: P0115961
Facility ID: 0238000194
Effective Date: 1/6/2014

Authorization

Facility ID: 0238000194
Application Number(s): A0049536
Permit Number: P0115961
Permit Description: Renewal FEPTIO for two (2) woodworking operations (P001 and P002) and five (5) coating operations (R001, R002, R003, R005, and R006).
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 1/6/2014
Effective Date: 1/6/2014
Expiration Date: 1/6/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Valley View Oak, LLC
8211 Township Road 652
Millersburg, OH 44654

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

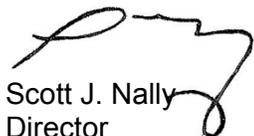
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0115961
 Permit Description: Renewal FEPTIO for two (2) woodworking operations (P001 and P002) and five (5) coating operations (R001, R002, R003, R005, and R006).

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

- | | |
|-----------------------------------|-----------------------|
| Emissions Unit ID: | P001 |
| Company Equipment ID: | wood shop |
| Superseded Permit Number: | P0084799 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P002 |
| Company Equipment ID: | woodworking system #2 |
| Superseded Permit Number: | P0105300 |
| General Permit Category and Type: | Not Applicable |

Group Name: Coating Operations

Emissions Unit ID:	R001
Company Equipment ID:	booth 1
Superseded Permit Number:	P0084799
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R002
Company Equipment ID:	booth 2
Superseded Permit Number:	P0084799
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R003
Company Equipment ID:	booth 3
Superseded Permit Number:	P0104948
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R005
Company Equipment ID:	booth 5
Superseded Permit Number:	P0104948
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R006
Company Equipment ID:	booth 6
Superseded Permit Number:	P0084799
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Valley View Oak, LLC
Permit Number: P0115961
Facility ID: 0238000194
Effective Date: 1/6/2014

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
Valley View Oak, LLC
Permit Number: P0115961
Facility ID: 0238000194
Effective Date: 1/6/2014

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) B.2.a)b, B.2.b)(3), B.3.b), B.3.c), B.3.d), B.3.e), B.3.f), B.4.b), and B.5.a)(3).
 - 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) B.2.a)a, B.2.b)(1), B.2.b)(2), B.3.a), B.4.a), B.5.a)(1), and B.5.a)(2).

2. Applicable Emissions Limitations and/or Control Requirements

- a) Facility-wide emissions 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
(1)	OAC rule 3745-31-05 (D) (Synthetic Minor to Avoid Title V and MACT)	See sections B.2.b)(1) and B.2.b)(2).
(2)	ORC 3704.03 (F)(4)(c) and OAC rule 3745-114	See sections B.2.b)(3), B.3.b), B.3.c), B.3.d), B.3.e), B.3.f), B.4.b), and B.5.a)(3).

- b) Additional Terms and Conditions

- (1) The content of any single hazardous air pollutant (HAP) in any coating or cleanup material shall not exceed 36 percent, by weight, of the VOC portion of the coating or cleanup material, as applied. The content of the combined HAPs in any coating or cleanup material shall not exceed 96 percent, by weight, of the volatile organic compound (VOC) portion of the coating or cleanup material, as applied.
- (2) Volatile organic compound (VOC) emissions from all the coatings and cleanup materials for emissions units R001, R002, R003, R004, R005 and R006, combined, shall not exceed 25.0 tons per year, based upon a rolling, 12-month summation of the monthly emissions. The emissions units R001, R002, R003, R004, R005 and R006 have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the emissions, upon issuance of this permit.
- (3) In order to demonstrate compliance with the "Toxic Air Contaminant Statute", the Director has established, per ORC 3704.03(F)(4)(c), a limit for toluene, which shall not exceed 114.05 pounds per day for emissions units R001, R002, R003, R004, R005 and R006, combined. This daily allowable emission rate was calculated by multiplying the



approved daily operating schedule submitted in the permit application by the emission rate modeled (to determine the ground level concentration).

3. Monitoring and/or Recordkeeping Requirements

a) The permittee shall calculate and record the following information each month for emissions units R001, R002, R003, R004, R005 and R006, combined:

- (1) the company identification for each coating and cleanup material employed;
- (2) the number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;
- (3) the VOC content of each coating and cleanup material, as applied, in pounds per gallon;
- (4) the total monthly VOC emissions, in tons, from emissions units R001, R002, R003, R004, R005 and R006, combined;
- (5) the rolling, 12-month summation of the VOC emissions, in tons from emissions units R001, R002, R003, R004, R005 and R006, combined; and
- (6) the actual single HAP¹ content and the combined HAPs content for each coating and cleanup material, in percent by weight of the VOC portion of the coating or cleanup material, as applied, (i.e., the pounds of HAP per gallon divided by the pounds of VOC per gallon).

¹ A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials.

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

b) The permittee shall calculate and record the following information each day for emissions units R001, R002, R003, R004, R005 and R006, combined:

- (1) the number of gallons of each coating and cleanup material employed minus the number of gallons of the coating and cleanup material recovered for disposal;
- (2) the toluene content for each coating and cleanup material, in lbs/gal, employed; and
- (3) the total toluene emissions from emissions units R001, R002, R003, R004, R005 and R006, combined, in pounds per day.

c) The federally enforceable permit-to-install and operate (FEPTIO) application for these emissions unit(s), R001, R002, R003, R004, R005, and R006, 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 units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted 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:

- (1) 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.
- (2) The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- (3) This standard is/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):

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

The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

- a. Compound: Toluene
TLV (mg/m³): 75.36196
Maximum Hourly Emission Rate (lbs/hr): 4.752
Predicted 1-Hour Maximum Ground Level Concentration (ug/m³): 1,773.9
MAGLC (ug/m³): 1,794.33
- b. Compound: Stoddard Solvent
TLV (mg/m³): 572,597.14
Maximum Hourly Emission Rate (lbs/hr): 27.06



Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 10,101

MAGLC (ug/m3): 13,633.27

The permittee, having demonstrated that emissions of toluene, from emissions units R001, R002, R003, R004, R005, and R006, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

d) Prior to making any physical changes to or changes in the method of operation of the emissions units, 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:

- (1) 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;
- (2) 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
- (3) 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 PTI, PTIO, or FEPTIO (as applicable) 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.

e) 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):

- (1) 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.);



- (2) 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);
 - (3) 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
 - (4) 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.
- f) 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.

4. Reporting Requirements

- a) The permittee shall submit quarterly deviation (excursion) reports that identify:
- (1) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - a. 25.0 tons of VOC emissions per rolling, 12-month period from all the coatings and cleanup materials for emissions units R001, R002, R003, R004, R005 and R006, combined.
 - b. HAP content in any coating or cleanup material shall not exceed:
 - i. 36 percent of each single HAP, by weight, of the VOC portion of the coating or cleanup material, as applied; and
 - ii. 96 percent of combined HAPs, by weight, of the VOC portion of the coating or cleanup material, as applied.
 - (2) the probable cause of each deviation (excursion);
 - (3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - (4) the magnitude and duration of each deviation (excursion).

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



The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- b) 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.

5. Testing Requirements

- a) Compliance with the Emissions Limitations and/or Control Requirements specified in section B.2.a) and B.2.b) of these terms and conditions shall be determined in accordance with the following methods:

(1) Emission Limitation:

25.0 tons of VOC emissions per rolling, 12-month period from all the coatings and cleanup materials for emissions units R001, R002, R003, R004, R005 and R006, combined.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in B.3.a)(5).

(2) Emission Limitation:

HAP content in any coating or cleanup material shall not exceed:

- a. 36 percent of each single HAP, by weight, of the VOC portion of the coating or cleanup material, as applied; and
- b. 96 percent of combined HAPs, by weight, of the VOC portion of the coating or cleanup material, as applied.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in B.3.a)(6).

(3) Emission Limitation:

114.05 pounds toluene per day for emissions units R001, R002, R003, R004, R005 and R006, combined.



Final Permit-to-Install and Operate

Valley View Oak, LLC

Permit Number: P0115961

Facility ID: 0238000194

Effective Date: 1/6/2014

Applicable Compliance Method:

Compliance with shall be determined based upon the record keeping requirements specified in B.3.b)(3).



Final Permit-to-Install and Operate
Valley View Oak, LLC
Permit Number: P0115961
Facility ID: 0238000194
Effective Date: 1/6/2014

C. Emissions Unit Terms and Conditions



1. P001, wood shop

Operations, Property and/or Equipment Description:

woodworking shop controlled by a 20,000 acfm Carter Day dust collector and the associated wood waste load out.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07 (A)	Exempt. See section b)(2)a.
b.	OAC rule 3745-17-07 (B)	Exempt. See section b)(2)b.
c.	OAC rule 3745-17-08 (B)	Exempt. See section b)(2)c.
d.	OAC rule 3745-17-11	See sections b)(2)d and b)(2)e.
e.	OAC rule 3745-31-05 (A)(3)	See sections b)(2)f, b)(2)g, and b)(2)h.

(2) Additional Terms and Conditions

a. In accordance with OAC rule 3745-17-07 (A)(3)(h), these emissions units are exempt from the visible particulate emission limitation.

b. In accordance with OAC rule 3745-17-07 (B)(11)(d), OAC rule 3745-17-07 (B)(1) shall not apply to any fugitive emissions units which are exempted from the requirements of OAC rule 3745-17-08 (B).

c. The facility is not located at an Appendix A area of OAC rule 3745-17-08. In accordance with OAC rule 3745-17-08 (A)(1), these emissions units are exempt from the requirements of OAC rule 3745-17-08 (B).



- d. The uncontrolled emission rate for this emissions unit is not ascertained, and therefore, in accordance with OAC rule 3745-17-11 (A)(2)(a), Figure II of OAC rule 3745-17-11 is not applicable to this emissions unit.
- e. The facility is located in Holmes County. It is exempt from Table I requirements, per OAC rule 3745-17-11 (A)(2)(b).
- f. Particulate emissions (PE) shall not exceed 0.01 grain per dscf of exhaust gas, 1.71 pounds per hour and 7.5 tons per year from the dust collector exhaust.
- g. There shall be no visible emissions from the dust collector exhaust.
- h. Visible emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average during load out.

c) **Operational Restrictions**

- (1) The emissions from this emissions unit shall be vented to the dust collector at all times the emissions unit is in operation.
- (2) The dust collector shall be operated with a sufficient volumetric flow rate to eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.
- (3) During any unloading of sawdust into trucks from the dust collector hopper, every attempt shall be made to reduce or control fugitive dust emissions by minimizing the drop height to the truck, utilizing a truck with high side boards, or placing a covering over the discharge chute during the unloading process. The collection efficiency shall be considered adequate if there are no visible particulate emissions of fugitive dust from the fabric tube during wood waste storage silo load out in excess of 20 percent opacity, as a three-minute average.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the dust collector for emissions unit P001 is between 1 to 6 inches of water.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the dust collector when this emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the dust collector on a weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range 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 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 pressure drop 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.

This range or limit on the pressure drop across the dust collector is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall record in an operations log any time the telescoping fabric tubes or other drop height reduction tool on the hopper used to load out sawdust are not in use when sawdust load out is in operation.



e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the dust collector during the 12-month reporting period for this emissions unit:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the dust collector was outside of the acceptable range;
 - 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 dust collector;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA 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.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:
0.01 gr/dscf and 1.71 pounds per hour of PE

Applicable Compliance Methods:

If required compliance shall be demonstrated by performing an emission test in accordance with the methods and procedures specified in 40 CFR 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03 (B)(10),
 - b. Emission Limitation:
7.5 tons per year of PE for P001



Applicable Compliance Method:

The tons per year emission limitations were developed by multiplying the short-term allowable PE limitation (1.71 lbs/hr) by the maximum annual hours of operation (8,760 hours per year), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission Limitation:

There shall be no visible emissions from the dust collector exhaust.

a) Applicable Compliance Methods:

b)

c) Compliance with the no visible emission limit for the exhausts from the dust collector shall be determined using Test Method 22-like visible emission observations. (Although Test Method 22 applies to fugitive emissions units, the visible/no visible emissions observation technique of Test Method 22 can be applied to ducted emissions, i.e., Test Method 22-like visible emission observations.)

d. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average during loadout.

Applicable Compliance Method:

Compliance with the visible fugitive emission limitation shall be determined by OAC rule 3745-17-03(B)(3), in accordance with Method 9, as set forth in 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.



2. P002, woodworking system #2

Operations, Property and/or Equipment Description:

Woodworking system #2. Emissions are controlled by a cyclone and the associated wood waste load out.

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07 (A)	Exempt. See section b)(2)a.
b.	OAC rule 3745-17-07 (B)	Exempt. See section b)(2)b.
c.	OAC rule 3745-17-08 (B)	Exempt. See section b)(2)c.
d.	OAC rule 3745-17-11	See sections b)(2)d and b)(2)e.
e.	OAC rule 3745-31-05 (A)(3) As effective 11/30/2001	See sections b)(2)f and b)(2)g.
f.	OAC rule 3745-31-05 (A)(3) As effective 12/01/2006	See section b)(2)h.

(2) Additional Terms and Conditions

a. In accordance with OAC rule 3745-17-07 (A)(3)(h), these emissions units are exempt from the visible particulate emission limitation.

b. In accordance with OAC rule 3745-17-07 (B)(11)(d), OAC rule 3745-17-07 (B)(1) shall not apply to any fugitive emissions units which are exempted from the requirements of OAC rule 3745-17-08 (B).



- c. The facility is not located at an Appendix A area of OAC rule 3745-17-08. In accordance with OAC rule 3745-17-08 (A)(1), these emissions units are exempt from the requirements of OAC rule 3745-17-08 (B).
- d. The uncontrolled emission rate for this emissions unit is not ascertained, and therefore, in accordance with OAC rule 3745-17-11 (A)(2)(a), Figure II of OAC rule 3745-17-11 is not applicable to this emissions unit.
- e. The facility is located in Holmes County. It is exempt from Table I requirements, per OAC rule 3745-17-11 (A)(2)(b).
- f. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC Rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP) Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply: b)(1)e, b)(2)f, b)(2)g, and f)(1)a.
- g. Particulate emissions from this emissions unit shall not exceed 4.34 tons per year.
- h. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

Permittee proposed a voluntary restriction of venting emissions from this emissions unit to a cyclone to control particulate emissions to 4.34 tons per year when the emissions unit is in operation, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) The emissions from this emissions unit shall be vented to the dust collector at all times the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain the cyclone for controlling emissions from this emissions unit in accordance with manufacturer's recommendation, instruction, and operating manual(s).

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA 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.

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:

4.34 tons per year of PE for P002

a) Applicable Compliance Methods:

b)

Compliance shall be determined based upon the following equation:

$$E_p = (EF)(FR)(60 \text{ min/hr})(8,760 \text{ hr/yr}) / (7,000 \text{ grain/lb})(2,000 \text{ lbs/ton})$$

Where,

E_p = Annual particulate emission rate, in tons per year;

EF = Emission factor, 0.055 grain/dscf, AP-42, table 10.4-1, 4/78; and

FR = Gas flow rate, 2,100 cfm, from the cyclone outlet.

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group - Coating Operations: R001, R002, R003, R005, and R006

EU ID	Operations, Property and/or Equipment Description
R001	Booth 1, wood furniture coating operation with one manual HVLP pump/gun and a booth with overspray filters. Parts are air dried and moved on PowerCart and track system.
R002	Booth 2, wood furniture coating operation with one manual HVLP pump/gun and a booth with overspray filters. Parts are air dried and moved on PowerCart and track system.
R003	Booth 3, wood furniture coating operation with one manual HVLP pump/gun and a booth with overspray filters. Parts flash and then enter a 16 ft halogen tunnel. Parts move on PowerCart and track system.
R005	Booth 5, wood furniture coating operation with one manual HVLP pump/gun and a booth with overspray filters. Parts dry in an natural gas oven.
R006	Booth 6, wood furniture coating operation with one manual HVLP pump/gun and a booth with overspray filters. Parts air dry .

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. b)(1)e.

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

a. b)(1)c.

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 3745-17-11 (C)	See sections c)(1), c)(2), d)(1), d)(2), d)(3), d)(4), and d)(5).
b.	OAC rule 3745-21-07 (M)(2)	See section b)(2)a.
c.	OAC rule 3745-31-05 (D)	See section B.2.a)(1).
d.	OAC rule 3745-31-05 (A)(3) PTI No. 02-21819 for emissions units R001, R002, and R006	See sections b)(2)b and b)(2)c.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	P0104948 for emissions units R003 and R005	
e.	ORC 3704.03 (F)(4)(c) and OAC rule 3745-114	See section B.2.a)(2).

(2) Additional Terms and Conditions

- a. In accordance with OAC rule 3745-21-07(M)(3)(a), OAC rule 3745-21-07(M)(2) is not applicable because these emissions units are not equipped with control devices for OC emissions.
- b. Volatile organic compound (VOC) emissions from all the coatings shall not exceed the following:
 - i. For each emissions units R001, R002, or R006, 14.34 pounds per hour. [This limit is based upon the maximum application rate of 2.2 gallons per hour.]
 - ii. For each emissions units R003 or R005, 18.49 pounds per hour. [This limit is based upon the maximum application rate of 3.3 gallons per hour.]
- c. The VOC content of each coating shall not exceed the following, as applied:
 - i. For each emissions units R001, R002, or R006, 6.52 pounds per gallon; and
 - ii. For each emissions units R003 or R005, 5.60 pounds per gallon.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (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 maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.



- (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

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

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) The permittee shall collect and record the following information each day for each emissions unit:
 - a. The company identification for each coating employed;
 - b. The VOC content of each coating, in lbs/gallon, as applied;
 - c. The number of gallons of each coating employed minus the number of gallons of each coating recovered for disposal;
 - d. The total VOC emissions from all the coatings employed, in lbs/day, i.e., sum of (c) times (b);
 - e. The total number of hours the emissions unit was in operation; and
 - f. The average hourly VOC emission rate for all the coatings, i.e., d/e, in lbs/hr.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emissions Limitation:

VOC emissions from each emissions unit shall not exceed:

- i. For each emissions units R001, R002, or R006, 14.34 pounds per hour. [This limit is based upon the maximum application rate of 2.2 gallons per hour.]
- ii. For each emissions units R003 or R005, 18.49 pounds per hour. [This limit is based upon the maximum application rate of 3.3 gallons per hour.]

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be determined based upon the record keeping requirements specified in d)(6)f.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emissions Limitation:

VOC content for each emissions unit of each coating shall not exceed:

- i. For each emissions units R001, R002, or R006, 6.52 pounds per gallon;
and
- ii. For each emissions units R003 or R005, 5.60 pounds per gallon.

Applicable Compliance Method:

Any determination of VOC content, solids contents, or density of coating materia or cleanup material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings or cleanup material by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If,



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Valley View Oak, LLC

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Facility ID: 0238000194

Effective Date: 1/6/2014

pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

g) Miscellaneous Requirements

(1) None.