State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL MODIFICATION **CERTIFIED MAIL**
BUTLER COUNTY

Street Address: 122 S. Front Street
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address: Lazarus Gov. Center P.O. Box 1049

Application No: 14-05768
Fac ID: 1409030092
DATE: 6/6/2006

Pella Entry Systems
Jason Hale
7100 Dixie Highway
Fairfield, OH 45014

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA **HCDES**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 6/6/2006**
Terms and Conditions **Effective Date: 6/6/2006**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-05768

Application Number:	14-05768
Facility ID:	1409030092
Permit Fee:	**$100**
Name of Facility:	Pella Entry Systems
Person to Contact:	Jason Hale
Address:	7100 Dixie Highway Fairfield, OH 45014

Location of proposed air contaminant source(s) [emissions unit(s)]:
7100 Dixie Highway
Fairfield, **Ohio**

Description of proposed emissions unit(s):
Administrative modification to update facility emissions units subject to HAPs limitations.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Joseph P. Koncelik

Director

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

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

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

4. 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.

5. 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.

6. General Requirements

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

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

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

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

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

permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

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

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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:

i. 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.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

iv. 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 appropriate Ohio EPA District Office or local air agency 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:

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

ii. 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.

10. Permit-To-Operate Application

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

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing

of any transfer of this permit.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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

C. Permit-To-Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
OC	30.0

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
		OAC rule 3745-21-09(U)(1)(c)
		OAC rule 3745-31-05(D)
R011 - Finishing Area: Booth 1	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-21-07(G)	

Applicable Emissions Limitations/Control Measures	A.I.2.b., A.I.2.e. and A.II.1.	
Organic Compound (OC) emissions shall not exceed 11.5 pounds per hour when coating non-metal parts*, excluding cleanup. VOC emissions shall not exceed 8.1 pounds per hour when coating metal parts*, excluding cleanup. * These emissions limitations are based upon the emissions unit's potential to emit. Therefore no records are required to demonstrate compliance with these limits. See term and condition A.I.2.d. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G), OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D). Exempt - see term and condition A.II.2. See term and condition A.I.2.c. See terms and conditions		

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by material usage limitations, VOC content limitations, photochemically reactive material use limitation and mass emissions limitations.

2.b The actual facility wide emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units K001 (Doorline #1 with Reverse Rollcoater), K002 (Ransburg Paintline), R011, R012, R013, R015, R016, R017, R018 and R019 (Finishing Area Booths 1 through 8), K006 (Side light line), K004 (Door Line #3), K003 (Door Line #2), K007 (Milltreat operations) and K008 (Paint Booth) and other exempt or de miminus sources at this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing HAPs records to demonstrate compliance with the emissions limitations in term and condition A.I.2.b upon permit issuance.

2.c The Volatile Organic Compound (VOC) content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon as applied excluding water and exempt solvents.

2.d The Organic Compound (OC) content of each coating for non-metal parts employed in this emissions unit shall not exceed 5.0 pounds per gallon as applied excluding water and exempt solvents as a monthly volume-weighted average.

2.e The total OC emission rate from the application of coatings and cleanup materials in R011 through R013 and R015 through R019 combined shall not exceed 30.0 tons per year based on a rolling, 12-month summation.

II. Operational Restrictions

1. The total OC input from coatings and cleanup materials employed in R011 through R013 and R015 through R019 combined shall not exceed 30.0 tons per year based on a rolling, 12-month summation. The OC input shall be determined by multiplying the number of gallons of each coating and clean-up material employed per month by the OC content of each coating and clean-up material, in pounds per gallon. The OC input of coatings and clean-up materials shall be assumed to be 100 percent of the solvent content of the coatings and cleanup materials employed and, as such, is equivalent to the OC emissions rate.

   To ensure enforceability during the first 12 months of operation following the issuance

of this permit, the permittee shall not exceed the OC input levels specified in the following table:

Months	Maximum Allowable Cumulative Input Rate Of OC, in tons
1	5.0
1-2	7.5
1-3	10.0
1-4	12.5
1-5	15.0
1-6	17.5
1-7	20.0
1-8	22.5
1-9	25.0
1-10	27.5
1-11	30.0
1-12	30.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

2. When coating non-metal parts in this emissions unit, the use of photochemically reactive material (coating or clean-up material) as defined in OAC rule 3745-21-01(C)(5) is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units R011 through R013 and R015 through R019 combined:

   a. The name and identification number of each coating and cleanup material employed;

   b. The type of material coated (metal or non-metal) by each coating and clean-up material;

   c. For each material used on non-metal parts, an identification as to whether or not each coating or clean-up material is a photochemically reactive material;

d. The number of gallons of each coating and clean-up material employed;

e. The OC content of each coating and clean-up material employed, in pounds per gallon, as applied;

f. The monthly volume-weighted average OC content of all coatings employed to coat non-metal doors [the total pounds of OC from all coatings used on non-metal doors per month divided by the total gallons of coatings used on non-metal doors per month];

g. The total monthly OC input and OC emissions rate from all coatings and clean-up materials employed [the summation of (d) multiplied by (e) for each coating and cleanup material employed] in tons;

h. The total rolling, 12-month summation of the OC input and OC emissions rate [the summation of (f) plus the previous 11-month emissions totals] in tons;

i. For each material used on metal parts, the VOC content in pounds per gallon as applied, excluding water and exempt solvents; and

j. For each material used on non-metal parts, the OC content in pounds per gallon as applied, excluding water and exempt solvents.

2. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.b. :

a. The name and identification number of each coating employed;

b. The individual Hazardous Air Pollutant (HAP)*** content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];

d. The number of gallons of each coating employed;

e. The name and identification of each cleanup material/thinner employed;

f. The individual HAP content for each HAP of each cleanup material/thinner, in pounds of individual HAP per gallon of cleanup material, as applied;

g. The total combined HAP content of each cleanup material/thinner, in pounds of combined HAPs per gallon of cleanup material/thinner, as applied [sum all the

individual HAP contents from (f)];

h. The number of gallons of each cleanup material/thinner employed;

i. The total individual HAP emissions for each HAP from all coatings and cleanup materials/thinner employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating, accounting for the emission control efficiency, plus the sum of (f) times (h) for each cleanup material/thinner];

j. The total combined HAP emissions from all coatings, accounting for the emission control efficiency, and cleanup materials/thinner employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material/thinner];

k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months; and

l. The updated rolling, 12-month summation of emissions for total combined HAP's, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months.

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

IV. Reporting Requirements

1. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the total OC emissions from emissions units R011 through R013 and R015 through R019 for the previous calendar year. The reports shall also specify the total OC input, in pounds, of coatings, thinner and clean-up material employed in these emissions units for the previous calendar year. These reports shall be submitted by January 31 of each year.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

3. The permittee shall submit quarterly deviation reports that identify any exceedance of the HAP emissions limitations set forth in term A.I.2.b. If no exceedances occurred, the permittee shall state so in the report. deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

4. The permittee shall submit written reports to the Hamilton County Department of

Environmental Services which identify the amount of organic compounds (solvent) employed per month and the updated rolling, 12-month summation of the amount of organic compounds employed for emissions unit R011 through R013 and R015 through R019 combined. The reports shall also include the monthly OC emissions rate and the updated rolling, 12-month OC emissions rate. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying coatings and/or inks and cleanup materials (i.e., the VOC content limitations in terms and conditions A.I.2.c. and A.I.2.d.) The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I.1 shall be determined by the following methods:

   a. Emission Limitations:
   11.5 lbs of OC/hr from the coating of non-metal parts and
   8.1 lbs of VOC/hr from the coating of metal parts

   Applicable Compliance Method:
   The hourly OC emissions limitations shall be determined by multiplying the maximum OC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05768, received on September 16, 2005.

   The hourly VOC emissions limitations shall be determined by multiplying the maximum VOC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05768, received on September 16, 2005.

   b. Emission Limitation:
   Total OC emissions from R011 through R013 and R015 through R019 combined shall not exceed 30.0 TPY based on a rolling 12-month summation.

   Applicable Compliance Method:
   Compliance with the OC emissions limitation in term and condition A.I.2.e. shall be demonstrated by the record keeping in term and condition A.III.1.

   c. Emission Limitations:

The Volatile Organic Compound (VOC) content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon as applied excluding water and exempt solvents.
The Organic Compound (OC) content of each coating for non-metal parts employed in this emissions unit shall not exceed 5.0 pounds per gallon as applied excluding water and exempt solvents.

Applicable Compliance Method:
USEPA methods 24 and 24A shall be used to determine the OC or VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Compliance with the OC content limitation as a monthly, volume weighted average in term and condition A.I.2.d shall be demonstrated by the recordkeeping in term and condition A.III.1.

d. Emission Limitations:
Any single HAP: 9.9 tons per year
Any combination of HAPs: 24.9 tons per year

Applicable Compliance Method:
Compliance with the HAP emissions limitations in term and condition A.I.2.b. shall be demonstrated by the record keeping in term and condition A.III.2.

2. Compliance with the photochemically reactive material limitation in term and condition A.II.2. shall be demonstrated by the record keeping required in term and condition A.III.1.c.

VI. Miscellaneous Requirements

1. The terms and conditions of this Permit To Install shall supercede the terms and conditions of Permit To Install 14-05064 issued August 22, 2002 for emissions units R011, R012, R013 and R015 and the terms and conditions of Permit To Install 14-05768 issued on January 31, 2006 for emissions unit R011.

Emissions Unit ID: R011

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R011 - Finishing Area: Booth 1		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

   Pollutant : Ethylene Glycol

   TLV (ug/m3): 73,700

Maximum Hourly Emissions Rate (lbs/hr): 7.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 278

MAGLC (ug/m3): 1755

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it’s evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Emissions Unit ID: R012

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
R012 - Finishing Area: Booth 2	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(1)(c) OAC rule 3745-31-05(D)
	OAC rule 3745-21-07(G)	

Applicable Emissions Limitations/Control Measures Organic Compound (OC) emissions shall not exceed 11.5 pounds per hour when coating non-metal parts*, excluding cleanup. VOC emissions shall not exceed 8.1 pounds per hour when coating metal parts*, excluding cleanup. * These emissions limitations are based upon the emissions unit's potential to emit. Therefore no records are required to demonstrate compliance with these limits. See term and condition A.I.2.d. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G), OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D). Exempt - see term and condition A.II.2. See term and condition A.I.2.c. See terms and conditions	A.I.2.b., A.I.2.e. and A.II.1.	

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by material usage limitations, VOC content limitations, photochemically reactive material use limitation and mass emissions limitations.

2.b The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R011, R012, R013, R015, R016, R017, R018 and R019 (Finishing Area Booths 1 through 8), K006 (Side light line), K004 (Door Line #3), K003 (Door Line #2), K007 (Milltreat operations) and K008 (Paint Booth) at this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing HAPs records to demonstrate compliance with the emissions limitations in term and condition A.I.2.b upon permit issuance.

2.c The Volatile Organic Compound (VOC) content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon as applied excluding water and exempt solvents.

2.d The Organic Compound (OC) content of each coating for non-metal parts employed in this emissions unit shall not exceed 5.0 pounds per gallon as applied excluding water and exempt solvents as a monthly volume-weighted average.

2.e The total OC emission rate from the application of coatings and cleanup materials in R011 through R013 and R015 through R019 combined shall not exceed 30.0 tons per year based on a rolling, 12-month summation.

II. Operational Restrictions

1. The total OC input from coatings and cleanup materials employed in R011 through R013 and R015 through R019 combined shall not exceed 30.0 tons per year based on a rolling, 12-month summation. The OC input shall be determined by multiplying the number of gallons of each coating and clean-up material employed per month by the OC content of each coating and clean-up material, in pounds per gallon. The OC input of coatings and clean-up materials shall be assumed to be 100 percent of the solvent content of the coatings and cleanup materials employed and, as such, is equivalent to the OC emissions rate.

Emissions Unit ID: R012

To ensure enforceability during the first 12 months of operation following the issuance of this permit, the permittee shall not exceed the OC input levels specified in the following table:

Months	Maximum Allowable Cumulative Input Rate Of OC, in tons
1	5.0
1-2	7.5
1-3	10.0
1-4	12.5
1-5	15.0
1-6	17.5
1-7	20.0
1-8	22.5
1-9	25.0
1-10	27.5
1-11	30.0
1-12	30.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

2. When coating non-metal parts in this emissions unit, the use of photochemically reactive material (coating or clean-up material) as defined in OAC rule 3745-21-01(C)(5) is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units R011 through R013 and R015 through R019 combined:

   a. The name and identification number of each coating and cleanup material employed;

   b. The type of material coated (metal or non-metal) by each coating and clean-up material;

   c. For each material used on non-metal parts, an identification as to whether or not each coating or clean-up material is a photochemically reactive material;

   d. The number of gallons of each coating and clean-up material employed;

e. The OC content of each coating and clean-up material employed, in pounds per gallon, as applied;

f. The monthly volume-weighted average OC content of all coatings employed to coat non-metal doors [the total pounds of OC from all coatings used on non-metal doors per month divided by the total gallons of coatings used on non-metal doors per month];

g. The total monthly OC input and OC emissions rate from all coatings and clean-up materials employed [the summation of (d) multiplied by (e) for each coating and cleanup material employed] in tons;

h. The total rolling, 12-month summation of the OC input and OC emissions rate [the summation of (f) plus the previous 11-month emissions totals] in tons;

i. For each material used on metal parts, the VOC content in pounds per gallon as applied, excluding water and exempt solvents; and

j. For each material used on non-metal parts, the OC content in pounds per gallon as applied, excluding water and exempt solvents.

2. The permittee shall collect and record the following information each month for emissions units R011, R012, R013, R015, R016, R017, R018 and R019 (Finishing Area Booths 1 through 8), P014 (Glass Department), K006 (Side light line), K004 (Door line #3), K003 (Door line #2), K007 (Milltreat operations) and K008 (Paint booth):

a. The name and identification number of each coating employed;

b. The individual Hazardous Air Pollutant (HAP)*** content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];

d. The number of gallons of each coating employed;

e. The name and identification of each cleanup material/thinner employed;

f. The individual HAP content for each HAP of each cleanup material/thinner, in pounds of individual HAP per gallon of cleanup material, as applied;

g. The total combined HAP content of each cleanup material/thinner, in pounds of combined HAPs per gallon of cleanup material/thinner, as applied [sum all the individual HAP contents from (f)];

h. The number of gallons of each cleanup material/thinner employed;

i. The total individual HAP emissions for each HAP from all coatings and cleanup materials/thinner employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating, accounting for the emission control efficiency, plus the sum of (f) times (h) for each cleanup material/thinner];

j. The total combined HAP emissions from all coatings, accounting for the emission control efficiency, and cleanup materials/thinner employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material/thinner];

k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months; and

l. The updated rolling, 12-month summation of emissions for total combined HAP's, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months.

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

IV. Reporting Requirements

1. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the total OC emissions from emissions units R011 through R013 and R015 through R019 for the previous calendar year. The reports shall also specify the total OC input, in pounds, of coatings, thinner and clean-up material employed in these emissions units for the previous calendar year. These reports shall be submitted by January 31 of each year.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services

within 30 days after the exceedance occurs.

3. The permittee shall submit quarterly deviation reports that identify any exceedance of the HAP emissions limitations set forth in term A.I.2.b. If no exceedances occurred, the permittee shall state so in the report. deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

4. The permittee shall submit written reports to the Hamilton County Department of Environmental Services which identify the amount of organic compounds (solvent) employed per month and the updated rolling, 12-month summation of the amount of organic compounds employed for emissions unit R011 through R013 and R015 through R019 combined. The reports shall also include the monthly OC emissions rate and the updated rolling, 12-month OC emissions rate. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying coatings and/or inks and cleanup materials (i.e., the VOC content limitations in terms and conditions A.I.2.c. and A.I.2.d.) The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I.1 shall be determined by the following methods:

   a. Emission Limitations:
   11.5 lbs of OC/hr from the coating of non-metal parts and
   8.1 lbs of VOC/hr from the coating of metal parts

   Applicable Compliance Method:
   The hourly OC emissions limitations shall be determined by multiplying the maximum OC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05768, received on September 16, 2005.

   The hourly VOC emissions limitations shall be determined by multiplying the maximum VOC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05768, received on September 16, 2005.

   b. Emission Limitation:

Total OC emissions from R011 through R013 and R015 through R019 combined shall not exceed 30.0 TPY based on a rolling 12-month summation.

Applicable Compliance Method:
Compliance with the OC emissions limitation in term and condition A.I.2.e. shall be demonstrated by the record keeping in term and condition A.III.1.

c. Emission Limitations:
The Volatile Organic Compound (VOC) content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon as applied excluding water and exempt solvents.

The Organic Compound (OC) content of each coating for non-metal parts employed in this emissions unit shall not exceed 5.0 pounds per gallon as applied excluding water and exempt solvents.

Applicable Compliance Method:
USEPA methods 24 and 24A shall be used to determine the OC or VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Compliance with the OC content limitation as a monthly, volume weighted average in term and condition A.I.2.d shall be demonstrated by the recordkeeping in term and condition A.III.1.

d. Emission Limitations:
Any single HAP: 9.9 tons per year
Any combination of HAPs: 24.9 tons per year

Applicable Compliance Method:
Compliance with the HAP emissions limitations in term and condition A.I.2.b. shall be demonstrated by the record keeping in term and condition A.III.2.

2. Compliance with the photochemically reactive material limitation in term and condition A.II.2. shall be demonstrated by the record keeping required in term and condition A.III.1.c.

VI. Miscellaneous Requirements

1. The terms and conditions of this Permit To Install shall supercede the terms and conditions of Permit To Install 14-05064 issued August 22, 2002 for emissions units R011, R012, R013 and R015.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R012 - Finishing Area: Booth 2		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

   Pollutant : Ethylene Glycol

   TLV (ug/m3): 73,700

Maximum Hourly Emissions Rate (lbs/hr): 7.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 278

MAGLC (ug/m3): 1755

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it’s evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
		OAC rule 3745-21-09(U)(1)(c)
		OAC rule 3745-31-05(D)
R013 - Finishing Area: Booth 3	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-21-07(G)	

Applicable Emissions Limitations/Control Measures	A.I.2.b., A.I.2.e. and A.II.1.	
Organic Compound (OC) emissions shall not exceed 11.5 pounds per hour when coating non-metal parts*, excluding cleanup. VOC emissions shall not exceed 8.1 pounds per hour when coating metal parts*, excluding cleanup. * These emissions limitations are based upon the emissions unit's potential to emit. Therefore no records are required to demonstrate compliance with these limits. See term and condition A.I.2.d. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G), OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D). Exempt - see term and condition A.II.2. See term and condition A.I.2.c. See terms and conditions		

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by material usage limitations, VOC content limitations, photochemically reactive material use limitation and mass emissions limitations.

2.b The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R011, R012, R013, R015, R016, R017, R018 and R019 (Finishing Area Booths 1 through 8), K006 (Side light line), K004 (Door Line #3), K003 (Door Line #2), K007 (Milltreat operations) and K008 (Paint Booth) at this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing HAPs records to demonstrate compliance with the emissions limitations in term and condition A.I.2.b upon permit issuance.

2.c The Volatile Organic Compound (VOC) content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon as applied excluding water and exempt solvents.

2.d The Organic Compound (OC) content of each coating for non-metal parts employed in this emissions unit shall not exceed 5.0 pounds per gallon as applied excluding water and exempt solvents as a monthly volume-weighted average.

2.e The total OC emission rate from the application of coatings and cleanup materials in R011 through R013 and R015 through R019 combined shall not exceed 30.0 tons per year based on a rolling, 12-month summation.

II. Operational Restrictions

1. The total OC input from coatings and cleanup materials employed in R011 through R013 and R015 through R019 combined shall not exceed 30.0 tons per year based on a rolling, 12-month summation. The OC input shall be determined by multiplying the number of gallons of each coating and clean-up material employed per month by the OC content of each coating and clean-up material, in pounds per gallon. The OC input of coatings and clean-up materials shall be assumed to be 100 percent of the solvent content of the coatings and cleanup materials employed and, as such, is equivalent to the OC emissions rate.

Emissions Unit ID: R013

To ensure enforceability during the first 12 months of operation following the issuance of this permit, the permittee shall not exceed the OC input levels specified in the following table:

Months	Maximum Allowable Cumulative Input Rate Of OC, in tons
1	5.0
1-2	7.5
1-3	10.0
1-4	12.5
1-5	15.0
1-6	17.5
1-7	20.0
1-8	22.5
1-9	25.0
1-10	27.5
1-11	30.0
1-12	30.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

2. When coating non-metal parts in this emissions unit, the use of photochemically reactive material (coating or clean-up material) as defined in OAC rule 3745-21-01(C)(5) is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units R011 through R013 and R015 through R019 combined:

   a. The name and identification number of each coating and cleanup material employed;

   b. The type of material coated (metal or non-metal) by each coating and clean-up material;

   c. For each material used on non-metal parts, an identification as to whether or not each coating or clean-up material is a photochemically reactive material;

   d. The number of gallons of each coating and clean-up material employed;

e. The OC content of each coating and clean-up material employed, in pounds per gallon, as applied;

f. The monthly volume-weighted average OC content of all coatings employed to coat non-metal doors [the total pounds of OC from all coatings used on non-metal doors per month divided by the total gallons of coatings used on non-metal doors per month];

g. The total monthly OC input and OC emissions rate from all coatings and clean-up materials employed [the summation of (d) multiplied by (e) for each coating and cleanup material employed] in tons;

h. The total rolling, 12-month summation of the OC input and OC emissions rate [the summation of (f) plus the previous 11-month emissions totals] in tons;

i. For each material used on metal parts, the VOC content in pounds per gallon as applied, excluding water and exempt solvents; and

j. For each material used on non-metal parts, the OC content in pounds per gallon as applied, excluding water and exempt solvents.

2. The permittee shall collect and record the following information each month for emissions units R011, R012, R013, R015, R016, R017, R018 and R019 (Finishing Area Booths 1 through 8), P014 (Glass Department), K006 (Side light line), K004 (Door line #3), K003 (Door line #2), K007 (Milltreat operations) and K008 (Paint booth):

a. The name and identification number of each coating employed;

b. The individual Hazardous Air Pollutant (HAP)*** content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];

d. The number of gallons of each coating employed;

e. The name and identification of each cleanup material/thinner employed;

f. The individual HAP content for each HAP of each cleanup material/thinner, in pounds of individual HAP per gallon of cleanup material, as applied;

g. The total combined HAP content of each cleanup material/thinner, in pounds of combined HAPs per gallon of cleanup material/thinner, as applied [sum all the individual HAP contents from (f)];

h. The number of gallons of each cleanup material/thinner employed;

i. The total individual HAP emissions for each HAP from all coatings and cleanup materials/thinner employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating, accounting for the emission control efficiency, plus the sum of (f) times (h) for each cleanup material/thinner];

j. The total combined HAP emissions from all coatings, accounting for the emission control efficiency, and cleanup materials/thinner employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material/thinner];

k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months; and

l. The updated rolling, 12-month summation of emissions for total combined HAP's, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months.

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

IV. Reporting Requirements

1. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the total OC emissions from emissions units R011 through R013 and R015 through R019 for the previous calendar year. The reports shall also specify the total OC input, in pounds, of coatings, thinner and clean-up material employed in these emissions units for the previous calendar year. These reports shall be submitted by January 31 of each year.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

3. The permittee shall submit quarterly deviation reports that identify any exceedance of

the HAP emissions limitations set forth in term A.I.2.b. If no exceedances occurred, the permittee shall state so in the report. deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

4. The permittee shall submit written reports to the Hamilton County Department of Environmental Services which identify the amount of organic compounds (solvent) employed per month and the updated rolling, 12-month summation of the amount of organic compounds employed for emissions unit R011 through R013 and R015 through R019 combined. The reports shall also include the monthly OC emissions rate and the updated rolling, 12-month OC emissions rate. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying coatings and/or inks and cleanup materials (i.e., the VOC content limitations in terms and conditions A.I.2.c. and A.I.2.d.) The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I.1 shall be determined by the following methods:

   a. Emission Limitations:
   11.5 lbs of OC/hr from the coating of non-metal parts and
   8.1 lbs of VOC/hr from the coating of metal parts

   Applicable Compliance Method:
   The hourly OC emissions limitations shall be determined by multiplying the maximum OC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05768, received on September 16, 2005.

   The hourly VOC emissions limitations shall be determined by multiplying the maximum VOC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05768, received on September 16, 2005.

   b. Emission Limitation:

Total OC emissions from R011 through R013 and R015 through R019 combined shall not exceed 30.0 TPY based on a rolling 12-month summation.

Applicable Compliance Method:
Compliance with the OC emissions limitation in term and condition A.I.2.e. shall be demonstrated by the record keeping in term and condition A.III.1.

c. Emission Limitations:
The Volatile Organic Compound (VOC) content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon as applied excluding water and exempt solvents.
The Organic Compound (OC) content of each coating for non-metal parts employed in this emissions unit shall not exceed 5.0 pounds per gallon as applied excluding water and exempt solvents.

Applicable Compliance Method:
USEPA methods 24 and 24A shall be used to determine the OC or VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Compliance with the OC content limitation as a monthly, volume weighted average in term and condition A.I.2.d shall be demonstrated by the recordkeeping in term and condition A.III.1.

d. Emission Limitations:
Any single HAP: 9.9 tons per year
Any combination of HAPs: 24.9 tons per year

Applicable Compliance Method:
Compliance with the HAP emissions limitations in term and condition A.I.2.b. shall be demonstrated by the record keeping in term and condition A.III.2.

2. Compliance with the photochemically reactive material limitation in term and condition A.II.2. shall be demonstrated by the record keeping required in term and condition A.III.1.c.

VI. Miscellaneous Requirements

1. The terms and conditions of this Permit To Install shall supercede the terms and

conditions of Permit To Install 14-05064 issued August 22, 2002 for emissions units R011, R012, R013 and R015.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R013 - Finishing Area: Booth 3		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

   Pollutant : Ethylene Glycol

   TLV (ug/m3): 73,700

Emissions Unit ID: R013

Maximum Hourly Emissions Rate (lbs/hr): 7.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 278

MAGLC (ug/m3): 1755

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
		OAC rule 3745-21-09(U)(1)(c)
		OAC rule 3745-31-05(D)
R015 - Finishing Area: Booth 4	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-21-07(G)	

Applicable Emissions Limitations/Control Measures
Organic Compound (OC) emissions shall not exceed 11.5 pounds per hour when coating non-metal parts*, excluding cleanup. VOC emissions shall not exceed 8.1 pounds per hour when coating metal parts*, excluding cleanup. * These emissions limitations are based upon the emissions unit's potential to emit. Therefore no records are required to demonstrate compliance with these limits. See term and condition A.I.2.d. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G), OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D). Exempt - see term and condition A.II.2. See term and condition A.I.2.c. See terms and conditions A.I.2.b., A.I.2.e. and A.II.1.

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by material usage limitations, VOC content limitations, photochemically reactive material use limitation and mass emissions limitations.

2.b The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R011, R012, R013, R015, R016, R017, R018 and R019 (Finishing Area Booths 1 through 8), K006 (Side light line), K004 (Door Line #3), K003 (Door Line #2), K007 (Milltreat operations) and K008 (Paint Booth) at this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing HAPs records to demonstrate compliance with the emissions limitations in term and condition A.I.2.b upon permit issuance.

2.c The Volatile Organic Compound (VOC) content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon as applied excluding water and exempt solvents.

2.d The Organic Compound (OC) content of each coating for non-metal parts employed in this emissions unit shall not exceed 5.0 pounds per gallon as applied excluding water and exempt solvents as a monthly volume-weighted average.

2.e The total OC emission rate from the application of coatings and cleanup materials in R011 through R013 and R015 through R019 combined shall not exceed 30.0 tons per year based on a rolling, 12-month summation.

II. Operational Restrictions

1. The total OC input from coatings and cleanup materials employed in R011 through R013 and R015 through R019 combined shall not exceed 30.0 tons per year based on a rolling, 12-month summation. The OC input shall be determined by multiplying the number of gallons of each coating and clean-up material employed per month by the OC content of each coating and clean-up material, in pounds per gallon. The OC input of coatings and clean-up materials shall be assumed to be 100 percent of the solvent content of the coatings and cleanup materials employed and, as such, is equivalent to the OC emissions rate.

   To ensure enforceability during the first 12 months of operation following the issuance of this permit, the permittee shall not exceed the OC input levels specified in the

following table:

Months	Maximum Allowable Cumulative Input Rate Of OC, in tons
1	5.0
1-2	7.5
1-3	10.0
1-4	12.5
1-5	15.0
1-6	17.5
1-7	20.0
1-8	22.5
1-9	25.0
1-10	27.5
1-11	30.0
1-12	30.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

2. When coating non-metal parts in this emissions unit, the use of photochemically reactive material (coating or clean-up material) as defined in OAC rule 3745-21-01(C)(5) is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units R011 through R013 and R015 through R019 combined:

   a. The name and identification number of each coating and cleanup material employed;

   b. The type of material coated (metal or non-metal) by each coating and clean-up material;

   c. For each material used on non-metal parts, an identification as to whether or not each coating or clean-up material is a photochemically reactive material;

   d. The number of gallons of each coating and clean-up material employed;

e. The OC content of each coating and clean-up material employed, in pounds per gallon, as applied;

f. The monthly volume-weighted average OC content of all coatings employed to coat non-metal doors [the total pounds of OC from all coatings used on non-metal doors per month divided by the total gallons of coatings used on non-metal doors per month];

g. The total monthly OC input and OC emissions rate from all coatings and clean-up materials employed [the summation of (d) multiplied by (e) for each coating and cleanup material employed] in tons;

h. The total rolling, 12-month summation of the OC input and OC emissions rate [the summation of (f) plus the previous 11-month emissions totals] in tons;

i. For each material used on metal parts, the VOC content in pounds per gallon as applied, excluding water and exempt solvents; and

j. For each material used on non-metal parts, the OC content in pounds per gallon as applied, excluding water and exempt solvents.

2. The permittee shall collect and record the following information each month for emissions units R011, R012, R013, R015, R016, R017, R018 and R019 (Finishing Area Booths 1 through 8), P014 (Glass Department), K006 (Side light line), K004 (Door line #3), K003 (Door line #2), K007 (Milltreat operations) and K008 (Paint booth):

a. The name and identification number of each coating employed;

b. The individual Hazardous Air Pollutant (HAP)*** content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];

d. The number of gallons of each coating employed;

e. The name and identification of each cleanup material/thinner employed;

f. The individual HAP content for each HAP of each cleanup material/thinner, in pounds of individual HAP per gallon of cleanup material, as applied;

g. The total combined HAP content of each cleanup material/thinner, in pounds of combined HAPs per gallon of cleanup material/thinner, as applied [sum all the individual HAP contents from (f)];

h. The number of gallons of each cleanup material/thinner employed;

i. The total individual HAP emissions for each HAP from all coatings and cleanup materials/thinner employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating, accounting for the emission control efficiency, plus the sum of (f) times (h) for each cleanup material/thinner];

j. The total combined HAP emissions from all coatings, accounting for the emission control efficiency, and cleanup materials/thinner employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material/thinner];

k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months; and

l. The updated rolling, 12-month summation of emissions for total combined HAP's, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months.

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

IV. Reporting Requirements

1. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the total OC emissions from emissions units R011 through R013 and R015 through R019 for the previous calendar year. The reports shall also specify the total OC input, in pounds, of coatings, thinner and clean-up material employed in these emissions units for the previous calendar year. These reports shall be submitted by January 31 of each year.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services

within 30 days after the exceedance occurs.

3. The permittee shall submit quarterly deviation reports that identify any exceedance of the HAP emissions limitations set forth in term A.I.2.b. If no exceedances occurred, the permittee shall state so in the report. deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

4. The permittee shall submit written reports to the Hamilton County Department of Environmental Services which identify the amount of organic compounds (solvent) employed per month and the updated rolling, 12-month summation of the amount of organic compounds employed for emissions unit R011 through R013 and R015 through R019 combined. The reports shall also include the monthly OC emissions rate and the updated rolling, 12-month OC emissions rate. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying coatings and/or inks and cleanup materials (i.e., the VOC content limitations in terms and conditions A.I.2.c. and A.I.2.d.) The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I.1 shall be determined by the following methods:

   a. Emission Limitations:
   11.5 lbs of OC/hr from the coating of non-metal parts and
   8.1 lbs of VOC/hr from the coating of metal parts

   Applicable Compliance Method:
   The hourly OC emissions limitations shall be determined by multiplying the maximum OC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05768, received on September 16, 2005.

   The hourly VOC emissions limitations shall be determined by multiplying the maximum VOC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05768, received on September 16, 2005.

   b. Emission Limitation:

Total OC emissions from R011 through R013 and R015 through R019 combined shall not exceed 30.0 TPY based on a rolling 12-month summation.

Applicable Compliance Method:
Compliance with the OC emissions limitation in term and condition A.I.2.e. shall be demonstrated by the record keeping in term and condition A.III.1.

c. Emission Limitations:
The Volatile Organic Compound (VOC) content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon as applied excluding water and exempt solvents.
The Organic Compound (OC) content of each coating for non-metal parts employed in this emissions unit shall not exceed 5.0 pounds per gallon as applied excluding water and exempt solvents.

Applicable Compliance Method:
USEPA methods 24 and 24A shall be used to determine the OC or VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Compliance with the OC content limitation as a monthly, volume weighted average in term and condition A.I.2.d shall be demonstrated by the recordkeeping in term and condition A.III.1.

d. Emission Limitations:
Any single HAP: 9.9 tons per year
Any combination of HAPs: 24.9 tons per year

Applicable Compliance Method:
Compliance with the HAP emissions limitations in term and condition A.I.2.b. shall be demonstrated by the record keeping in term and condition A.III.2.

2. Compliance with the photochemically reactive material limitation in term and condition A.II.2. shall be demonstrated by the record keeping required in term and condition A.III.1.c.

VI. Miscellaneous Requirements

1. The terms and conditions of this Permit To Install shall supercede the terms and conditions of Permit To Install 14-05064 issued August 22, 2002 for emissions units R011, R012, R013 and R015.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R015 - Finishing Area: Booth 4		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

   Pollutant : Ethylene Glycol

   TLV (ug/m3): 73,700

Maximum Hourly Emissions Rate (lbs/hr): 7.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 278

MAGLC (ug/m3): 1755

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it’s evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
R016 - Finishing Area: Booth 5	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-09(U)(1)(c) OAC rule 3745-31-05(D)
	OAC rule 3745-21-07(G)	

Applicable Emissions Limitations/Control Measures	A.I.2.b., A.I.2.e. and A.II.1.	
Organic Compound (OC) emissions shall not exceed 11.5 pounds per hour when coating non-metal parts*, excluding cleanup. VOC emissions shall not exceed 8.1 pounds per hour when coating metal parts*, excluding cleanup. * These emissions limitations are based upon the emissions unit's potential to emit. Therefore no records are required to demonstrate compliance with these limits. See term and condition A.I.2.d. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G), OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D). Exempt - see term and condition A.II.2. See term and condition A.I.2.c. See terms and conditions		

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by material usage limitations, VOC content limitations, photochemically reactive material use limitation and mass emissions limitations.

2.b The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R011, R012, R013, R015, R016, R017, R018 and R019 (Finishing Area Booths 1 through 8), K006 (Side light line), K004 (Door Line #3), K003 (Door Line #2), K007 (Milltreat operations) and K008 (Paint Booth) at this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing HAPs records to demonstrate compliance with the emissions limitations in term and condition A.I.2.b upon permit issuance.

2.c The Volatile Organic Compound (VOC) content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon as applied excluding water and exempt solvents.

2.d The Organic Compound (OC) content of each coating for non-metal parts employed in this emissions unit shall not exceed 5.0 pounds per gallon as applied excluding water and exempt solvents as a monthly volume-weighted average.

2.e The total OC emission rate from the application of coatings and cleanup materials in R011 through R013 and R015 through R019 combined shall not exceed 30.0 tons per year based on a rolling, 12-month summation.

II. Operational Restrictions

1. The total OC input from coatings and cleanup materials employed in R011 through R013 and R015 through R019 combined shall not exceed 30.0 tons per year based on a rolling, 12-month summation. The OC input shall be determined by multiplying the number of gallons of each coating and clean-up material employed per month by the OC content of each coating and clean-up material, in pounds per gallon. The OC input of coatings and clean-up materials shall be assumed to be 100 percent of the solvent content of the coatings and cleanup materials employed and, as such, is equivalent to the OC emissions rate.

Emissions Unit ID: R016

To ensure enforceability during the first 12 months of operation following the issuance of this permit, the permittee shall not exceed the OC input levels specified in the following table:

Months	Maximum Allowable Cumulative Input Rate Of OC, in tons
1	5.0
1-2	7.5
1-3	10.0
1-4	12.5
1-5	15.0
1-6	17.5
1-7	20.0
1-8	22.5
1-9	25.0
1-10	27.5
1-11	30.0
1-12	30.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

2. When coating non-metal parts in this emissions unit, the use of photochemically reactive material (coating or clean-up material) as defined in OAC rule 3745-21-01(C)(5) is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units R011 through R013 and R015 through R019 combined:

   a. The name and identification number of each coating and cleanup material employed;

   b. The type of material coated (metal or non-metal) by each coating and clean-up material;

   c. For each material used on non-metal parts, an identification as to whether or not each coating or clean-up material is a photochemically reactive material;

   d. The number of gallons of each coating and clean-up material employed;

e. The OC content of each coating and clean-up material employed, in pounds per gallon, as applied;

f. The monthly volume-weighted average OC content of all coatings employed to coat non-metal doors [the total pounds of OC from all coatings used on non-metal doors per month divided by the total gallons of coatings used on non-metal doors per month];

g. The total monthly OC input and OC emissions rate from all coatings and clean-up materials employed [the summation of (d) multiplied by (e) for each coating and cleanup material employed] in tons;

h. The total rolling, 12-month summation of the OC input and OC emissions rate [the summation of (f) plus the previous 11-month emissions totals] in tons;

i. For each material used on metal parts, the VOC content in pounds per gallon as applied, excluding water and exempt solvents; and

j. For each material used on non-metal parts, the OC content in pounds per gallon as applied, excluding water and exempt solvents.

2. The permittee shall collect and record the following information each month for emissions units R011, R012, R013, R015, R016, R017, R018 and R019 (Finishing Area Booths 1 through 8), P014 (Glass Department), K006 (Side light line), K004 (Door line #3), K003 (Door line #2), K007 (Milltreat operations) and K008 (Paint booth):

a. The name and identification number of each coating employed;

b. The individual Hazardous Air Pollutant (HAP)*** content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];

d. The number of gallons of each coating employed;

e. The name and identification of each cleanup material/thinner employed;

f. The individual HAP content for each HAP of each cleanup material/thinner, in pounds of individual HAP per gallon of cleanup material, as applied;

g. The total combined HAP content of each cleanup material/thinner, in pounds of combined HAPs per gallon of cleanup material/thinner, as applied [sum all the individual HAP contents from (f)];

h. The number of gallons of each cleanup material/thinner employed;

i. The total individual HAP emissions for each HAP from all coatings and cleanup materials/thinner employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating, accounting for the emission control efficiency, plus the sum of (f) times (h) for each cleanup material/thinner];

j. The total combined HAP emissions from all coatings, accounting for the emission control efficiency, and cleanup materials/thinner employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material/thinner];

k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months; and

l. The updated rolling, 12-month summation of emissions for total combined HAP's, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months.

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

IV. Reporting Requirements

1. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the total OC emissions from emissions units R011 through R013 and R015 through R019 for the previous calendar year. The reports shall also specify the total OC input, in pounds, of coatings, thinner and clean-up material employed in these emissions units for the previous calendar year. These reports shall be submitted by January 31 of each year.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services

within 30 days after the exceedance occurs.

3. The permittee shall submit quarterly deviation reports that identify any exceedance of the HAP emissions limitations set forth in term A.I.2.b. If no exceedances occurred, the permittee shall state so in the report. deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

4. The permittee shall submit written reports to the Hamilton County Department of Environmental Services which identify the amount of organic compounds (solvent) employed per month and the updated rolling, 12-month summation of the amount of organic compounds employed for emissions unit R011 through R013 and R015 through R019 combined. The reports shall also include the monthly OC emissions rate and the updated rolling, 12-month OC emissions rate. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying coatings and/or inks and cleanup materials (i.e., the VOC content limitations in terms and conditions A.I.2.c. and A.I.2.d.) The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I.1 shall be determined by the following methods:

   a. Emission Limitations:
   11.5 lbs of OC/hr from the coating of non-metal parts and
   8.1 lbs of VOC/hr from the coating of metal parts

   Applicable Compliance Method:
   The hourly OC emissions limitations shall be determined by multiplying the maximum OC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05768, received on September 16, 2005.

   The hourly VOC emissions limitations shall be determined by multiplying the maximum VOC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05768, received on September 16, 2005.

   b. Emission Limitation:

Total OC emissions from R011 through R013 and R015 through R019 combined shall not exceed 30.0 TPY based on a rolling 12-month summation.

Applicable Compliance Method:
Compliance with the OC emissions limitation in term and condition A.I.2.e. shall be demonstrated by the record keeping in term and condition A.III.1.

c. Emission Limitations:
The Volatile Organic Compound (VOC) content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon as applied excluding water and exempt solvents.

The Organic Compound (OC) content of each coating for non-metal parts employed in this emissions unit shall not exceed 5.0 pounds per gallon as applied excluding water and exempt solvents.

Applicable Compliance Method:
USEPA methods 24 and 24A shall be used to determine the OC or VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Compliance with the OC content limitation as a monthly, volume weighted average in term and condition A.I.2.d shall be demonstrated by the recordkeeping in term and condition A.III.1.

d. Emission Limitations:
Any single HAP: 9.9 tons per year
Any combination of HAPs: 24.9 tons per year

Applicable Compliance Method:
Compliance with the HAP emissions limitations in term and condition A.I.2.b. shall be demonstrated by the record keeping in term and condition A.III.2.

2. Compliance with the photochemically reactive material limitation in term and condition A.II.2. shall be demonstrated by the record keeping required in term and condition A.III.1.c.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R016 - Finishing Area: Booth 5		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

   Pollutant : Ethylene Glycol

   TLV (ug/m3): 73,700

Maximum Hourly Emissions Rate (lbs/hr): 7.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 278

MAGLC (ug/m3): 1755

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it’s evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
		OAC rule 3745-21-09(U)(1)(c)
		OAC rule 3745-31-05(D)
R017 - Finishing Area: Booth 6	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-21-07(G)	

Applicable Emissions Limitations/Control Measures	A.I.2.b., A.I.2.e. and A.II.1.	
Organic Compound (OC) emissions shall not exceed 11.5 pounds per hour when coating non-metal parts*, excluding cleanup. VOC emissions shall not exceed 8.1 pounds per hour when coating metal parts*, excluding cleanup. * These emissions limitations are based upon the emissions unit's potential to emit. Therefore no records are required to demonstrate compliance with these limits. See term and condition A.I.2.d. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G), OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D). Exempt - see term and condition A.II.2. See term and condition A.I.2.c. See terms and conditions		

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by material usage limitations, VOC content limitations, photochemically reactive material use limitation and mass emissions limitations.

2.b The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R011, R012, R013, R015, R016, R017, R018 and R019 (Finishing Area Booths 1 through 8), K006 (Side light line), K004 (Door Line #3), K003 (Door Line #2), K007 (Milltreat operations) and K008 (Paint Booth) at this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing HAPs records to demonstrate compliance with the emissions limitations in term and condition A.I.2.b upon permit issuance.

2.c The Volatile Organic Compound (VOC) content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon as applied excluding water and exempt solvents.

2.d The Organic Compound (OC) content of each coating for non-metal parts employed in this emissions unit shall not exceed 5.0 pounds per gallon as applied excluding water and exempt solvents as a monthly volume-weighted average.

2.e The total OC emission rate from the application of coatings and cleanup materials in R011 through R013 and R015 through R019 combined shall not exceed 30.0 tons per year based on a rolling, 12-month summation.

II. Operational Restrictions

1. The total OC input from coatings and cleanup materials employed in R011 through R013 and R015 through R019 combined shall not exceed 30.0 tons per year based on a rolling, 12-month summation. The OC input shall be determined by multiplying the number of gallons of each coating and clean-up material employed per month by the OC content of each coating and clean-up material, in pounds per gallon. The OC input of coatings and clean-up materials shall be assumed to be 100 percent of the solvent content of the coatings and cleanup materials employed and, as such, is equivalent to the OC emissions rate.

Emissions Unit ID: R017

To ensure enforceability during the first 12 months of operation following the issuance of this permit, the permittee shall not exceed the OC input levels specified in the following table:

Months	Maximum Allowable Cumulative Input Rate Of OC, in tons
1	5.0
1-2	7.5
1-3	10.0
1-4	12.5
1-5	15.0
1-6	17.5
1-7	20.0
1-8	22.5
1-9	25.0
1-10	27.5
1-11	30.0
1-12	30.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

2. When coating non-metal parts in this emissions unit, the use of photochemically reactive material (coating or clean-up material) as defined in OAC rule 3745-21-01(C)(5) is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units R011 through R013 and R015 through R019 combined:

   a. The name and identification number of each coating and cleanup material employed;

   b. The type of material coated (metal or non-metal) by each coating and clean-up material;

   c. For each material used on non-metal parts, an identification as to whether or not each coating or clean-up material is a photochemically reactive material;

   d. The number of gallons of each coating and clean-up material employed;

e. The OC content of each coating and clean-up material employed, in pounds per gallon, as applied;

f. The monthly volume-weighted average OC content of all coatings employed to coat non-metal doors [the total pounds of OC from all coatings used on non-metal doors per month divided by the total gallons of coatings used on non-metal doors per month];

g. The total monthly OC input and OC emissions rate from all coatings and clean-up materials employed [the summation of (d) multiplied by (e) for each coating and cleanup material employed] in tons;

h. The total rolling, 12-month summation of the OC input and OC emissions rate [the summation of (f) plus the previous 11-month emissions totals] in tons;

i. For each material used on metal parts, the VOC content in pounds per gallon as applied, excluding water and exempt solvents; and

j. For each material used on non-metal parts, the OC content in pounds per gallon as applied, excluding water and exempt solvents.

2. The permittee shall collect and record the following information each month for emissions units R011, R012, R013, R015, R016, R017, R018 and R019 (Finishing Area Booths 1 through 8), P014 (Glass Department), K006 (Side light line), K004 (Door line #3), K003 (Door line #2), K007 (Milltreat operations) and K008 (Paint booth):

a. The name and identification number of each coating employed;

b. The individual Hazardous Air Pollutant (HAP)*** content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];

d. The number of gallons of each coating employed;

e. The name and identification of each cleanup material/thinner employed;

f. The individual HAP content for each HAP of each cleanup material/thinner, in pounds of individual HAP per gallon of cleanup material, as applied;

g. The total combined HAP content of each cleanup material/thinner, in pounds of combined HAPs per gallon of cleanup material/thinner, as applied [sum all the individual HAP contents from (f)];

h. The number of gallons of each cleanup material/thinner employed;

i. The total individual HAP emissions for each HAP from all coatings and cleanup materials/thinner employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating, accounting for the emission control efficiency, plus the sum of (f) times (h) for each cleanup material/thinner];

j. The total combined HAP emissions from all coatings, accounting for the emission control efficiency, and cleanup materials/thinner employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material/thinner];

k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months; and

l. The updated rolling, 12-month summation of emissions for total combined HAP's, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months.

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

IV. Reporting Requirements

1. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the total OC emissions from emissions units R011 through R013 and R015 through R019 for the previous calendar year. The reports shall also specify the total OC input, in pounds, of coatings, thinner and clean-up material employed in these emissions units for the previous calendar year. These reports shall be submitted by January 31 of each year.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

3. The permittee shall submit quarterly deviation reports that identify any exceedance of

the HAP emissions limitations set forth in term A.I.2.b. If no exceedances occurred, the permittee shall state so in the report. deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

4. The permittee shall submit written reports to the Hamilton County Department of Environmental Services which identify the amount of organic compounds (solvent) employed per month and the updated rolling, 12-month summation of the amount of organic compounds employed for emissions unit R011 through R013 and R015 through R019 combined. The reports shall also include the monthly OC emissions rate and the updated rolling, 12-month OC emissions rate. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying coatings and/or inks and cleanup materials (i.e., the VOC content limitations in terms and conditions A.I.2.c. and A.I.2.d.) The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I.1 shall be determined by the following methods:

   a. Emission Limitations:
   11.5 lbs of OC/hr from the coating of non-metal parts and
   8.1 lbs of VOC/hr from the coating of metal parts

   Applicable Compliance Method:
   The hourly OC emissions limitations shall be determined by multiplying the maximum OC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05768, received on September 16, 2005.

   The hourly VOC emissions limitations shall be determined by multiplying the maximum VOC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05768, received on September 16, 2005.

   b. Emission Limitation:

Emissions Unit ID: R017

Total OC emissions from R011 through R013 and R015 through R019 combined shall not exceed 30.0 TPY based on a rolling 12-month summation.

Applicable Compliance Method:
Compliance with the OC emissions limitation in term and condition A.I.2.e. shall be demonstrated by the record keeping in term and condition A.III.1.

c. Emission Limitations:
The Volatile Organic Compound (VOC) content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon as applied excluding water and exempt solvents.

The Organic Compound (OC) content of each coating for non-metal parts employed in this emissions unit shall not exceed 5.0 pounds per gallon as applied excluding water and exempt solvents.

Applicable Compliance Method:
USEPA methods 24 and 24A shall be used to determine the OC or VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Compliance with the OC content limitation as a monthly, volume weighted average in term and condition A.I.2.d shall be demonstrated by the recordkeeping in term and condition A.III.1.

d. Emission Limitations:
Any single HAP: 9.9 tons per year
Any combination of HAPs: 24.9 tons per year

Applicable Compliance Method:
Compliance with the HAP emissions limitations in term and condition A.I.2.b. shall be demonstrated by the record keeping in term and condition A.III.2.

2. Compliance with the photochemically reactive material limitation in term and condition A.II.2. shall be demonstrated by the record keeping required in term and condition A.III.1.c.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R017 - Finishing Area: Booth 6		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

   Pollutant : Ethylene Glycol

   TLV (ug/m3): 73,700

Emissions Unit ID: R017

Maximum Hourly Emissions Rate (lbs/hr): 7.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 278

MAGLC (ug/m3): 1755

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it’s evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
		OAC rule 3745-21-09(U)(1)(c)
		OAC rule 3745-31-05(D)
R018 - Finishing Area: Booth 7	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-21-07(G)	

Applicable Emissions Limitations/Control Measures	A.I.2.b., A.I.2.e. and A.II.1.	
Organic Compound (OC) emissions shall not exceed 11.5 pounds per hour when coating non-metal parts*, excluding cleanup. VOC emissions shall not exceed 8.1 pounds per hour when coating metal parts*, excluding cleanup. * These emissions limitations are based upon the emissions unit's potential to emit. Therefore no records are required to demonstrate compliance with these limits. See term and condition A.I.2.d. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G), OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D). Exempt - see term and condition A.II.2. See term and condition A.I.2.c. See terms and conditions		

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by material usage limitations, VOC content limitations, photochemically reactive material use limitation and mass emissions limitations.

2.b The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R011, R012, R013, R015, R016, R017, R018 and R019 (Finishing Area Booths 1 through 8), K006 (Side light line), K004 (Door Line #3), K003 (Door Line #2), K007 (Milltreat operations) and K008 (Paint Booth) at this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing HAPs records to demonstrate compliance with the emissions limitations in term and condition A.I.2.b upon permit issuance.

2.c The Volatile Organic Compound (VOC) content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon as applied excluding water and exempt solvents.

2.d The Organic Compound (OC) content of each coating for non-metal parts employed in this emissions unit shall not exceed 5.0 pounds per gallon as applied excluding water and exempt solvents as a monthly volume-weighted average.

2.e The total OC emission rate from the application of coatings and cleanup materials in R011 through R013 and R015 through R019 combined shall not exceed 30.0 tons per year based on a rolling, 12-month summation.

II. Operational Restrictions

1. The total OC input from coatings and cleanup materials employed in R011 through R013 and R015 through R019 combined shall not exceed 30.0 tons per year based on a rolling, 12-month summation. The OC input shall be determined by multiplying the number of gallons of each coating and clean-up material employed per month by the OC content of each coating and clean-up material, in pounds per gallon. The OC input of coatings and clean-up materials shall be assumed to be 100 percent of the solvent content of the coatings and cleanup materials employed and, as such, is equivalent to the OC emissions rate.

   To ensure enforceability during the first 12 months of operation following the issuance of this permit, the permittee shall not exceed the OC input levels specified in the following table:

Months	Maximum Allowable Cumulative Input Rate Of OC, in tons
1	5.0
1-2	7.5
1-3	10.0
1-4	12.5
1-5	15.0
1-6	17.5
1-7	20.0
1-8	22.5
1-9	25.0
1-10	27.5
1-11	30.0
1-12	30.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

2. When coating non-metal parts in this emissions unit, the use of photochemically reactive material (coating or clean-up material) as defined in OAC rule 3745-21-01(C)(5) is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units R011 through R013 and R015 through R019 combined:

   a. The name and identification number of each coating and cleanup material employed;

   b. The type of material coated (metal or non-metal) by each coating and clean-up material;

   c. For each material used on non-metal parts, an identification as to whether or not each coating or clean-up material is a photochemically reactive material;

   d. The number of gallons of each coating and clean-up material employed;

e. The OC content of each coating and clean-up material employed, in pounds per gallon, as applied;

f. The monthly volume-weighted average OC content of all coatings employed to coat non-metal doors [the total pounds of OC from all coatings used on non-metal doors per month divided by the total gallons of coatings used on non-metal doors per month];

g. The total monthly OC input and OC emissions rate from all coatings and clean-up materials employed [the summation of (d) multiplied by (e) for each coating and cleanup material employed] in tons;

h. The total rolling, 12-month summation of the OC input and OC emissions rate [the summation of (f) plus the previous 11-month emissions totals] in tons;

i. For each material used on metal parts, the VOC content in pounds per gallon as applied, excluding water and exempt solvents; and

j. For each material used on non-metal parts, the OC content in pounds per gallon as applied, excluding water and exempt solvents.

2. The permittee shall collect and record the following information each month for emissions units R011, R012, R013, R015, R016, R017, R018 and R019 (Finishing Area Booths 1 through 8), P014 (Glass Department), K006 (Side light line), K004 (Door line #3), K003 (Door line #2), K007 (Milltreat operations) and K008 (Paint booth):

a. The name and identification number of each coating employed;

b. The individual Hazardous Air Pollutant (HAP)*** content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];

d. The number of gallons of each coating employed;

e. The name and identification of each cleanup material/thinner employed;

f. The individual HAP content for each HAP of each cleanup material/thinner, in pounds of individual HAP per gallon of cleanup material, as applied;

g. The total combined HAP content of each cleanup material/thinner, in pounds of combined HAPs per gallon of cleanup material/thinner, as applied [sum all the individual HAP contents from (f)];

h. The number of gallons of each cleanup material/thinner employed;

i. The total individual HAP emissions for each HAP from all coatings and cleanup materials/thinner employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating, accounting for the emission control efficiency, plus the sum of (f) times (h) for each cleanup material/thinner];

j. The total combined HAP emissions from all coatings, accounting for the emission control efficiency, and cleanup materials/thinner employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material/thinner];

k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months; and

l. The updated rolling, 12-month summation of emissions for total combined HAP's, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months.

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

IV. Reporting Requirements

1. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the total OC emissions from emissions units R011 through R013 and R015 through R019 for the previous calendar year. The reports shall also specify the total OC input, in pounds, of coatings, thinner and clean-up material employed in these emissions units for the previous calendar year. These reports shall be submitted by January 31 of each year.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.

3. The permittee shall submit quarterly deviation reports that identify any exceedance of

the HAP emissions limitations set forth in term A.I.2.b. If no exceedances occurred, the permittee shall state so in the report. deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

4. The permittee shall submit written reports to the Hamilton County Department of Environmental Services which identify the amount of organic compounds (solvent) employed per month and the updated rolling, 12-month summation of the amount of organic compounds employed for emissions unit R011 through R013 and R015 through R019 combined. The reports shall also include the monthly OC emissions rate and the updated rolling, 12-month OC emissions rate. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying coatings and/or inks and cleanup materials (i.e., the VOC content limitations in terms and conditions A.I.2.c. and A.I.2.d.) The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I.1 shall be determined by the following methods:

   a. Emission Limitations:
   11.5 lbs of OC/hr from the coating of non-metal parts and
   8.1 lbs of VOC/hr from the coating of metal parts

   Applicable Compliance Method:
   The hourly OC emissions limitations shall be determined by multiplying the maximum OC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05768, received on September 16, 2005.

   The hourly VOC emissions limitations shall be determined by multiplying the maximum VOC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05768, received on September 16, 2005.

   b. Emission Limitation:
   Total OC emissions from R011 through R013 and R015 through R019 combined shall not exceed 30.0 TPY based on a rolling 12-month summation.

Applicable Compliance Method:
Compliance with the OC emissions limitation in term and condition A.I.2.e. shall be demonstrated by the record keeping in term and condition A.III.1.

c. Emission Limitations:
The Volatile Organic Compound (VOC) content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon as applied excluding water and exempt solvents.
The Organic Compound (OC) content of each coating for non-metal parts employed in this emissions unit shall not exceed 5.0 pounds per gallon as applied excluding water and exempt solvents.

Applicable Compliance Method:
USEPA methods 24 and 24A shall be used to determine the OC or VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Compliance with the OC content limitation as a monthly, volume weighted average in term and condition A.I.2.d shall be demonstrated by the recordkeeping in term and condition A.III.1.

d. Emission Limitations:
Any single HAP: 9.9 tons per year
Any combination of HAPs: 24.9 tons per year

Applicable Compliance Method:
Compliance with the HAP emissions limitations in term and condition A.I.2.b. shall be demonstrated by the record keeping in term and condition A.III.2.

2. Compliance with the photochemically reactive material limitation in term and condition A.II.2. shall be demonstrated by the record keeping required in term and condition A.III.1.c.

VI. Miscellaneous Requirements

None

Emissions Unit ID: R018

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R018 - Finishing Area: Booth 7		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

   Pollutant : Ethylene Glycol

   TLV (ug/m3): 73,700

Maximum Hourly Emissions Rate (lbs/hr): 7.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 278

MAGLC (ug/m3): 1755

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it’s evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	
		OAC rule 3745-21-09(U)(1)(c)
		OAC rule 3745-31-05(D)
R019 - Finishing Area: Booth 8	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-21-07(G)	

Applicable Emissions Limitations/Control Measures	A.I.2.b., A.I.2.e. and A.II.1.	
Organic Compound (OC) emissions shall not exceed 11.5 pounds per hour when coating non-metal parts*, excluding cleanup. VOC emissions shall not exceed 8.1 pounds per hour when coating metal parts*, excluding cleanup. * These emissions limitations are based upon the emissions unit's potential to emit. Therefore no records are required to demonstrate compliance with these limits. See term and condition A.I.2.d. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G), OAC rule 3745-21-09(U)(1)(c) and OAC rule 3745-31-05(D). Exempt - see term and condition A.II.2. See term and condition A.I.2.c. See terms and conditions		

2. Additional Terms and Conditions

2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by material usage limitations, VOC content limitations, photochemically reactive material use limitation and mass emissions limitations.

2.b The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R011, R012, R013, R015, R016, R017, R018 and R019 (Finishing Area Booths 1 through 8), K006 (Side light line), K004 (Door Line #3), K003 (Door Line #2), K007 (Milltreat operations) and K008 (Paint Booth) at this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

The permittee has existing HAPs records to demonstrate compliance with the emissions limitations in term and condition A.I.2.b upon permit issuance.

2.c The Volatile Organic Compound (VOC) content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon as applied excluding water and exempt solvents.

2.d The Organic Compound (OC) content of each coating for non-metal parts employed in this emissions unit shall not exceed 5.0 pounds per gallon as applied excluding water and exempt solvents as a monthly volume-weighted average.

2.e The total OC emission rate from the application of coatings and cleanup materials in R011 through R013 and R015 through R019 combined shall not exceed 30.0 tons per year based on a rolling, 12-month summation.

II. Operational Restrictions

1. The total OC input from coatings and cleanup materials employed in R011 through R013 and R015 through R019 combined shall not exceed 30.0 tons per year based on a rolling, 12-month summation. The OC input shall be determined by multiplying the number of gallons of each coating and clean-up material employed per month by the OC content of each coating and clean-up material, in pounds per gallon. The OC input of coatings and clean-up materials shall be assumed to be 100 percent of the solvent content of the coatings and cleanup materials employed and, as such, is equivalent to the OC emissions rate.

Emissions Unit ID: R019

To ensure enforceability during the first 12 months of operation following the issuance of this permit, the permittee shall not exceed the OC input levels specified in the following table:

Months	Maximum Allowable Cumulative Input Rate Of OC, in tons
1	5.0
1-2	7.5
1-3	10.0
1-4	12.5
1-5	15.0
1-6	17.5
1-7	20.0
1-8	22.5
1-9	25.0
1-10	27.5
1-11	30.0
1-12	30.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual OC input limitation shall be based upon a rolling, 12-month summation of the OC input figures.

2. When coating non-metal parts in this emissions unit, the use of photochemically reactive material (coating or clean-up material) as defined in OAC rule 3745-21-01(C)(5) is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for emissions units R011 through R013 and R015 through R019 combined:

   a. The name and identification number of each coating and cleanup material employed;

   b. The type of material coated (metal or non-metal) by each coating and clean-up material;

   c. For each material used on non-metal parts, an identification as to whether or not each coating or clean-up material is a photochemically reactive material;

   d. The number of gallons of each coating and clean-up material employed;

e. The OC content of each coating and clean-up material employed, in pounds per gallon, as applied;

f. The monthly volume-weighted average OC content of all coatings employed to coat non-metal doors [the total pounds of OC from all coatings used on non-metal doors per month divided by the total gallons of coatings used on non-metal doors per month];

g. The total monthly OC input and OC emissions rate from all coatings and clean-up materials employed [the summation of (d) multiplied by (e) for each coating and cleanup material employed] in tons;

h. The total rolling, 12-month summation of the OC input and OC emissions rate [the summation of (f) plus the previous 11-month emissions totals] in tons;

i. For each material used on metal parts, the VOC content in pounds per gallon as applied, excluding water and exempt solvents; and

j. For each material used on non-metal parts, the OC content in pounds per gallon as applied, excluding water and exempt solvents.

2. The permittee shall collect and record the following information each month for emissions units R011, R012, R013, R015, R016, R017, R018 and R019 (Finishing Area Booths 1 through 8), P014 (Glass Department), K006 (Side light line), K004 (Door line #3), K003 (Door line #2), K007 (Milltreat operations) and K008 (Paint booth):

a. The name and identification number of each coating employed;

b. The individual Hazardous Air Pollutant (HAP)*** content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;

c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];

d. The number of gallons of each coating employed;

e. The name and identification of each cleanup material/thinner employed;

f. The individual HAP content for each HAP of each cleanup material/thinner, in pounds of individual HAP per gallon of cleanup material, as applied;

g. The total combined HAP content of each cleanup material/thinner, in pounds of combined HAPs per gallon of cleanup material/thinner, as applied [sum all the individual HAP contents from (f)];

h. The number of gallons of each cleanup material/thinner employed;

i. The total individual HAP emissions for each HAP from all coatings and cleanup materials/thinner employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating, accounting for the emission control efficiency, plus the sum of (f) times (h) for each cleanup material/thinner];

j. The total combined HAP emissions from all coatings, accounting for the emission control efficiency, and cleanup materials/thinner employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material/thinner];

k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months; and

l. The updated rolling, 12-month summation of emissions for total combined HAP's, in pounds or tons. This shall include the information for the current month and the preceding eleven calender months.

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

IV. Reporting Requirements

1. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the total OC emissions from emissions units R011 through R013 and R015 through R019 for the previous calendar year. The reports shall also specify the total OC input, in pounds, of coatings, thinner and clean-up material employed in these emissions units for the previous calendar year. These reports shall be submitted by January 31 of each year.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services

within 30 days after the exceedance occurs.

3. The permittee shall submit quarterly deviation reports that identify any exceedance of the HAP emissions limitations set forth in term A.I.2.b. If no exceedances occurred, the permittee shall state so in the report. deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

4. The permittee shall submit written reports to the Hamilton County Department of Environmental Services which identify the amount of organic compounds (solvent) employed per month and the updated rolling, 12-month summation of the amount of organic compounds employed for emissions unit R011 through R013 and R015 through R019 combined. The reports shall also include the monthly OC emissions rate and the updated rolling, 12-month OC emissions rate. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying coatings and/or inks and cleanup materials (i.e., the VOC content limitations in terms and conditions A.I.2.c. and A.I.2.d.) The notification shall include a copy of such records and shall be sent to the Hamilton County Department of Environmental Services.

V. Testing Requirements

1. Compliance with the emission limitations specified in Section A.I.1 shall be determined by the following methods:

   a. Emission Limitations:
   11.5 lbs of OC/hr from the coating of non-metal parts and
   8.1 lbs of VOC/hr from the coating of metal parts

   Applicable Compliance Method:
   The hourly OC emissions limitations shall be determined by multiplying the maximum OC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05768, received on September 16, 2005.

   The hourly VOC emissions limitations shall be determined by multiplying the maximum VOC content as applied (pounds/gallons) by the maximum hourly coating usage rate (gallons/hour) as provided in Permit to Install application 14-05768, received on September 16, 2005.

   b. Emission Limitation:

Total OC emissions from R011 through R013 and R015 through R019 combined shall not exceed 30.0 TPY based on a rolling 12-month summation.

Applicable Compliance Method:
Compliance with the OC emissions limitation in term and condition A.I.2.e. shall be demonstrated by the record keeping in term and condition A.III.1.

c. Emission Limitations:
The Volatile Organic Compound (VOC) content of each coating for metal parts employed in this emissions unit shall not exceed 3.5 pounds per gallon as applied excluding water and exempt solvents.
The Organic Compound (OC) content of each coating for non-metal parts employed in this emissions unit shall not exceed 5.0 pounds per gallon as applied excluding water and exempt solvents.

Applicable Compliance Method:
USEPA methods 24 and 24A shall be used to determine the OC or VOC content for coatings and cleanup materials, respectively. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

Compliance with the OC content limitation as a monthly, volume weighted average in term and condition A.I.2.d shall be demonstrated by the recordkeeping in term and condition A.III.1.

d. Emission Limitations:
Any single HAP: 9.9 tons per year
Any combination of HAPs: 24.9 tons per year

Applicable Compliance Method:
Compliance with the HAP emissions limitations in term and condition A.I.2.b. shall be demonstrated by the record keeping in term and condition A.III.2.

2. Compliance with the photochemically reactive material limitation in term and condition A.II.2. shall be demonstrated by the record keeping required in term and condition A.III.1.c.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R019 - Finishing Area: Booth 8		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN3 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

   Pollutant : Ethylene Glycol

   TLV (ug/m3): 73,700

Maximum Hourly Emissions Rate (lbs/hr): 7.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 278

MAGLC (ug/m3): 1755

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it

conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed(composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of it’s evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

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

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None