

Synthetic Minor Determination and/or Netting Determination

Permit To Install: **14-05852**

A. Source Description

The Pella Entry Systems Division in Fairfield, Ohio manufactures and coats steel and composite doors for homes and light industry. The new emissions units (K009 and K010) included in this application for an air permit-to-install (PTI) are automated adhesive coating booths. The emissions expected from these units are volatile organic compounds (VOC).

B. Facility Emissions and Attainment Status

The facility is located in Butler County, which is non-attainment for the PM_{2.5} and 8-hour ozone standards. Before this permitting action, the facility-wide VOC emissions are over 100 tons per year and therefore the facility is currently a major stationary source located in non-attainment area and a major stationary source for purposes of Title V permitting.

C. Source Emissions

The calculated VOC potential to emit (PTE) when coating metal parts is 319 lbs/hour and 1,398 TPY. The requested permit limitations for VOC is 18.2 lbs/hour when coating non-metal parts and 319 lbs/hour when coating metal parts for each emissions unit, and 10 TPY for the annual limitation for both emissions units combined. The facility-wide total combined hazardous air pollutants (HAPs) limitation remains at 24.9 TPY and the individual hazardous air pollutant (HAP) limitation at 9.9 TPY. The information used to complete these calculations was included in the permit application.

D. Conclusion

The unrestricted PTE of VOC with this addition would have triggered non-attainment New Source Review and the emissions offset policy since the VOC emissions from this project alone would have exceeded the major modification level of 40 TPY. The facility is requesting to limit the VOC emissions from this project to a total of 10 TPY. The facility has had one additional air PTI within the past 12 month period. That air PTI (14-05768) had an increase in VOC emissions of less than 30 TPY. Hence, no federal emissions thresholds have been exceeded. The facility will also remain a synthetic minor with respect to HAP emissions.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
BUTLER COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 14-05852

Fac ID: 1409030092

DATE: 7/20/2006

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

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

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

CC: USEPA

HCDES

OH-KY-IN Regional Council of Gov.

KY

IN



STATE OF OHIO ENVIRONMENTAL PROTECTION
AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 14-05852

Application Number: 14-05852
Facility ID: 1409030092
Permit Fee: **To be entered upon final issuance**
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):
Two new adhesive coating booths.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Pella Entry Systems

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Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 1409030092

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

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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

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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.

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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.

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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

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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 obtained before 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.

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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.

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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

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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.

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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.

Pella Entry Systems**Facility ID: 1409030092****PTI Application: 14-05852****Issued: To be entered upon final issuance****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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	10.0
Single HAP/ Combined HAPs	9.9/24.9

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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**

- 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 - (K009) - Adhesive spray booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 18.2 pounds per hour when coating non-metal parts.* (excluding cleanup).</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 319 pounds per hour when coating metal parts.* (excluding cleanup).</p> <p>*These emission limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limitations.</p> <p>See term A.II.1 below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(C).</p>
OAC rule 3745-31-05(C) Synthetic minor to avoid Non-Attainment New Source Review and 40 CFR 63 Subpart Mmmm.	<p>The total VOC emissions from K009 and K010 (Adhesive spray booths) combined, shall not exceed 10.0 tons per year based upon a rolling, 12-month summation.</p> <p>See term A.I.2.b and A.II.2 below.</p>
OAC rule 3745-21-09(U)(1)(c)	<p>When coating metal parts, the VOC content of each coating, as applies, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.</p>
OAC rule 3745-21-07(G)	<p>Exempt, see term A.II.1 below.</p>

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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), K008 (Paint Booth), K009 and K010 (Adhesive spray booths) and other exempt or de minimis 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.

II. Operational Restrictions

1. When coating non-metal parts, the use of any photochemically reactive material (coating and/or cleanup material) in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The total VOC input from coatings and cleanup materials employed in K009 and K010 combined shall not exceed 10.0 tons per year based on a rolling, 12-month summation.

The VOC input shall be determined by multiplying the number of gallons of each coating and clean-up material employed per month by the VOC content of each coating and clean-up material, in pounds per gallon. The VOC 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 VOC emissions rate.

The permittee has existing facility-wide records to demonstrate compliance with the total VOC input and emission limitations from coatings and cleanup materials employed at the facility and therefore this emissions unit does not need to be restricted during the first year of operation.

III. Monitoring and/or Recordkeeping Requirements

Emissions Unit ID: K009

1. The permittee shall maintain monthly records of the following information for emissions units K009 and K010 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 VOC content of each coating and clean-up material employed, in pounds per gallon, as applied;
 - f. The monthly volume-weighted average VOC content of all coatings employed to coat non-metal doors [the total pounds of VOC 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 VOC input and VOC 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 VOC input and VOC emissions rate [the summation of (f) plus the previous 11-month emissions totals] in tons; and
 - i. For each material used on metal parts, the VOC content in pounds per gallon as applied, excluding water and exempt solvents.

Note: The permittee may track the coating usage based on the number of doors produced and use a coating usage factor (gallons of coating used per door produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall update the factor every six calendar months using actual inventory records if such a factor is used. The calculations used to develop the coating usage factor shall be maintained on file.

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

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

Emissions Unit ID: K009

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of non-complying coatings, when coating metal parts, in this emissions unit (i.e. for VOC content). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (coating and/or cleanup material) was employed in the emissions unit for the coating of non-metal parts. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) 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 (excursion) reports which identify all exceedances of the rolling, 12-month VOC input rate specified in term A.II.2 and/or the VOC emissions limitation specified in term A.I.1 for emissions units K009 and K010 combined.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAPs emissions limitations specified in term A.I.2.b. for emissions units identified in term A.I.2.b.
5. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
6. The permittee shall submit annual VOC emissions reports for this emissions unit. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

Emissions limitations:

18.2 lbs of VOC/hour from the coating of non-metal parts and 319 lbs of VOC/hour from the coating of metal parts.

Applicable Compliance Method:

The hourly VOC emission limitations were established by multiplying the maximum VOC content, as applied, of all the coatings (pounds/gallon) by the maximum hourly coating usage rate (gallons/hour).

If required, the permittee shall demonstrate compliance with these limits in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Emissions Unit ID: K009

Emissions limitation:

The VOC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents, for the coatings used for metal parts.

Applicable Compliance Method:

Compliance shall be demonstrated by the information collected and recorded in term A.III.1.

USEPA methods 24 and 24A shall be used to determine the 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.

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Emissions limitation:

Total VOC emissions and VOC input from emissions units K009 and K010, combined, shall not exceed 10.0 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the information collected and recorded in term A.III.1.

The permittee shall update the coating usage factor referenced in term A.III.1 at the end of each calendar semi-annual period. Permittee shall calculate the number of doors manufactured in the emissions unit and the number of gallons of coatings employed in the emissions unit. The coating usage factor shall be determined by dividing the total coating usage for the emissions unit by the total number of doors manufactured in the emissions unit. The coating usage factor shall then be used to calculate emissions for the next semi-annual period.

Emissions Limitations:

Any single HAP: 9.9 tons per year; and

Any combination of HAPs: 24.9 tons per year.

Applicable Compliance Method:

Compliance with the HAP emissions limitations in term and condition A.1.2.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.1 shall be demonstrated by the record keeping required in term and condition A.III.1.c.

VI. Miscellaneous Requirements

None

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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 - (K009) - Adhesive spray booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures

2. **Additional Terms and Conditions**

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.

IV. Reporting Requirements

None

Pella Entry Systems

DTI Application: 14 05952

Facility ID: 1409030092

Emissions Unit ID: K009

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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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 - (K010) - Adhesive spray booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile Organic Compound (VOC) emissions shall not exceed 18.2 pounds per hour when coating non-metal parts.* (excluding cleanup).</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 319 pounds per hour when coating metal parts.* (excluding cleanup).</p> <p>*These emission limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limitations.</p> <p>See term A.II.1 below.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-09(U)(1)(c) and 3745-31-05(C).OAC rule 3745-31-05(C).</p>
OAC rule 3745-31-05(C) Synthetic minor to avoid Non-Attainment New Source Review and 40 CFR 63 Subpart Mmmm.	<p>The total VOC emissions from K009 and K010 (Adhesive spray booths) combined, shall not exceed 10.0 tons per year based upon a rolling, 12-month summation.</p> <p>See term A.I.2.b and A.II.2 below.</p>
OAC rule 3745-21-09(U)(1)(c)	<p>When coating metal parts, the VOC content of each coating, as applies, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents.</p>
OAC rule 3745-21-07(G)	<p>Exempt, see term A.II.1 below.</p>

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Emissions Unit ID: K010

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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), K008 (Paint Booth), K009 and K010 (Adhesive spray booths) and other exempt or de minimis 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.

II. Operational Restrictions

1. When coating non-metal parts, the use of any photochemically reactive material (coating and/or cleanup material) in this emissions unit, as defined in OAC rule 3745-21-01(C)(5), is prohibited.
2. The total VOC input from coatings and cleanup materials employed in K009 and K010 combined shall not exceed 10.0 tons per year based on a rolling, 12-month summation.

The VOC input shall be determined by multiplying the number of gallons of each coating and clean-up material employed per month by the VOC content of each coating and clean-up material, in pounds per gallon. The VOC 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 VOC emissions rate.

The permittee has existing facility-wide records to demonstrate compliance with the total VOC input and emission limitations from coatings and cleanup materials employed at the facility and therefore this emissions unit does not need to be restricted during the first year of operation.

III. Monitoring and/or Recordkeeping Requirements

Emissions Unit ID: K010

1. The permittee shall maintain monthly records of the following information for emissions units K009 and K010 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 VOC content of each coating and clean-up material employed, in pounds per gallon, as applied;
 - f. The monthly volume-weighted average VOC content of all coatings employed to coat non-metal doors [the total pounds of VOC 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 VOC input and VOC 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 VOC input and VOC emissions rate [the summation of (f) plus the previous 11-month emissions totals] in tons; and
 - i. For each material used on metal parts, the VOC content in pounds per gallon as applied, excluding water and exempt solvents.

Note: The permittee may track the coating usage based on the number of doors produced and use a coating usage factor (gallons of coating used per door produced) to calculate the gallons of coating used from the number of doors manufactured. The permittee shall update the factor every six calendar months using actual inventory records if such a factor is used. The calculations used to develop the coating usage factor shall be maintained on file.

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

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

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of non-complying coatings, when coating metal parts, in this emissions unit (i.e. for VOC content). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (coating and/or cleanup material) was employed in the emissions unit for the coating of non-metal parts. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) 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 (excursion) reports which identify all exceedances of the rolling, 12-month VOC input rate specified in term A.II.2 and/or the VOC emissions limitation specified in term A.I.1 for emissions units K009 and K010 combined.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month HAPs emissions limitations specified in term A.I.2.b. for emissions units identified in term A.I.2.b.
5. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
6. The permittee shall submit annual VOC emissions reports for this emissions unit. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

Emissions limitations:

18.2 lbs of VOC/hour from the coating of non-metal parts and 319 lbs of VOC/hour from the coating of metal parts.

Applicable Compliance Method:

The hourly VOC emission limits were established by multiplying the maximum VOC content, as applied, of all the coatings (pounds/gallon) by the maximum hourly coating usage rate (gallons/hour).

If required, the permittee shall demonstrate compliance with these limits in accordance

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with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

Emissions limitation:

The VOC content of each coating, as applied, shall not exceed 3.5 pounds per gallon, excluding water and exempt solvents, for the coatings used for metal parts.

Applicable Compliance Method:

Compliance shall be demonstrated by the information collected and recorded in term A.III.1.

USEPA methods 24 and 24A shall be used to determine the 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.

Emissions limitation:

Total VOC emissions and VOC input from emissions units K009 and K010, combined, shall not exceed 10.0 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the information collected and recorded in term A.III.1.

The permittee shall update the coating usage factor referenced in term A.III.1 at the end of each calendar semi-annual period. Permittee shall calculate the number of doors manufactured in the emissions unit and the number of gallons of coatings employed in the emissions unit. The coating usage factor shall be determined by dividing the total coating usage for the emissions unit by the total number of doors manufactured in the emissions unit. The coating usage factor shall then be used to calculate emissions for the next semi-annual period.

Emissions Limitations:

Any single HAP: 9.9 tons per year; and
Any combination of HAPs: 24.9 tons per year.

Applicable Compliance Method:

Compliance with the HAP emissions limitations in term and condition A.1.2.b shall be demonstrated by the record keeping in term and condition A.III.2.

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

VI. Miscellaneous Requirements

None

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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 - (K009) - Adhesive spray booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.

IV. Reporting Requirements

None

V. Testing Requirements

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None

Emissions Unit ID: K010

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VI. Miscellaneous Requirements

None