



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION**

**CERTIFIED MAIL**

**BUTLER COUNTY**

**Application No: 14-05564**

**Fac ID: 1409030092**

**DATE: 12/26/2006**

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 modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of \$ 0 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 HCDDES OH-KY-IN Regional Council of Gov. KY IN

**PUBLIC NOTICE**  
**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-05564 FOR AN AIR CONTAMINANT SOURCE FOR**  
**Pella Entry Systems**

On 12/26/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Pella Entry Systems**, located at **7100 Dixie Highway, Fairfield, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05564:

**Administrative modification to assign a new emissions unit identification to the Milltreat Operations. This modification shall supersede PTI 14-05564 as issued on 4/19/2005.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howart Taft Pkwy,  
Cincinnati, OH 45219-2660 [(513)946-7777]



**Permit To Install  
Terms and Conditions**

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

**DRAFT MODIFICATION OF PERMIT TO INSTALL 14-05564**

Application Number: 14-05564  
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):  
**Administrative modification to assign a new emissions unit identification to the Milltreat Operations. This modification shall supersede PTI 14-05564 as issued on 4/19/2005.**

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

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Director

**Part I - GENERAL TERMS AND CONDITIONS**

**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

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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.

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- 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 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**

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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**

<b><u>Pollutant</u></b>	<b><u>Tons Per Year</u></b>
PM/PM10	8.45
OC	19.28

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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**

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 - (K008) - Paint Booth for Wood Parts - modification**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Organic compound (OC) emissions shall not exceed 5.51 pounds per hour* and 7.60 tons per year (TPY).</p> <p>Particulate emissions (PE) shall not exceed 1.0 pound per hour* and 1.67 tons per year (TPY).</p> <p>PE = PM10</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 and condition A.I.2.b and A.II.1.</p> <p>Visible particulate emissions from any stack shall not exceed 10 percent opacity, as a six-minute average, except as specified by rule.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).</p>
OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-07(G)	Exempt, see term and condition A.I.2.b.
OAC rule 3745-31-05(C)	See term and condition A.I.2.c.

## 2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by material usage limitation, visible emission limitation and mass emission limitations.
- 2.b The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.
- 2.c The actual emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emission units R015 (Spray booth 5), R013 (Spray booth 3), R012 (Spray booth 2), R011 (Spray booth 1), P014 (Glass Department), K006 (Side light line), K004 (Door line #3), K003 (Door line #2), K011 (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 already has existing HAP records, therefore, HAP emission limitations for the first 12 months of operation following the issuance of this permit are not required.

## II. Operational Restrictions

- 1. The maximum annual OC input of coating, thinners and clean-up material employed in emissions unit K008 shall not exceed 15,111 pounds per year, as applied. The OC input shall be determined by multiplying the number of gallons of each coating, thinner and clean-up material employed per month by the OC content of each coating, thinner and clean-up material, in pounds per gallon. The annual usage limits are based upon a summation of the monthly usage figures. The OC input of coatings, thinner and clean-up material is based upon the premise that 100% of the solvent contained within the coatings, thinner and clean-up material is emitted.

## III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the following information for this emissions unit:
  - a. The name and identification number for each coating, thinner and clean-up material, as applied;
  - b. The OC content of each coating, thinner and clean-up material in pounds per gallon, as applied;
  - c. The number of gallons of each coating, thinner and clean-up material employed;

Emissions Unit ID: K008

- d. The total OC emissions (input) from all coatings, thinners and clean-up material in pounds (b x c);
- e. The solids content of each coating, in percent by weight, as applied; and,
- f. The coating density of each coating, in pounds per gallon, as applied.

These records shall be summarized at the end of each calendar year.

- 2. The permittee shall collect and record the following information each month:
  - a. The company identification of each liquid organic material employed in this emissions unit; and
  - b. A record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
- 3. The permittee shall collect and record the following information each month for emissions units R015 (Spray booth 5), R013 (Spray booth 3), R012 (Spray booth 2), R011 (Spray booth 1), P014 (Glass Department), K006 (Side light line), K004 (Door line #3), K003 (Door line #2), K011 (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/thinner, 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 usage for each HAP from all coatings and cleanup materials/thinner employed, in pounds or tons per month [for each HAP the sum

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- of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material/thinner];
- j. The total combined HAP usage from all coatings 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 submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions from emissions unit K008 for the previous calendar year. This report shall also specify the total OC input, in pounds, of coatings, thinner and clean-up material employed in emissions unit K008 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 45 days after the exceedance occurs.
3. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.I.2.c.

The reports shall be submitted to the Director (the Hamilton County Department of

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Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months ( October through December, January through March, April through June and July through September, respectively) .

If no exceedances occurred, the permittee shall state so in the report.

## V. Testing Requirements

1. Emission Limitations:  
Organic compound (OC) emissions shall not exceed 5.51 pounds per hour, and 7.60 tons per year (TPY).

Applicable Compliance Method:

Compliance with the hourly OC emission limitation outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application 14-05564 submitted 08/24/04 and the addendum submitted 10/15/04. Compliance with the annual emission limitation shall be based upon the record-keeping in term A.III.1. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the inks and coatings. The annual emission rate shall be determined by summing the monthly OC emissions then dividing by 2000 which yields the emission rate in tons per year.

2. Emission Limitations:  
Particulate emissions (PE) shall not exceed 1.0 pound per hour\* and 1.67 tons per year (TPY).

PE = PM10

Applicable Compliance Method:

The pound per hour emission limitation is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limitation. Formulation data shall be used to determine the solids contents of the coatings. The annual emission rate shall be determined by the product of the solids content times the coating density times one minus the transfer efficiency times one minus the control efficiency times the number of gallons of coating applied divided by 2000 which yields the emission rate in tons per year.

3. Emissions Limitation:  
10% opacity as a six minute average

Applicable Compliance Method:

If required, compliance with the visible emission limitation stated in term and condition A.I.1 shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

4. Material Usage Limitation:

15,111 pound per year OC input.

Applicable Compliance Method:

Compliance with the OC input limitation in term and condition A.II.1 shall be demonstrated by the record keeping in term and condition A.III.1.

5. Material Usage Limitation:

The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

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Applicable Compliance Method:

Compliance with the limitation in term and condition A.I.2.b shall be demonstrated by the record keeping in term and condition A.III.2.

6. 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 emission limitations cited in term and condition A.I.2.c shall be demonstrated by the recordkeeping in term and condition A.III.3.

**VI. Miscellaneous Requirements**

1. The terms and conditions of this Permit to Install supersede the terms and conditions of Permit to Install 14-05564 as issued on November 16, 2004 and modified on April 19, 2005.

**Issued: To be entered upon final issuance**

**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 - (K008) - Paint Booth for Wood Parts - modification**

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**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous 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 compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as

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defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed threshold limit value (TLV) to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**Issued: To be entered upon final issuance**

**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 - (K011) - Milltreat Operations - Spray booth with catalytic thermal oxidizer - modification**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Organic compound (OC) emissions shall not exceed 7.4 pounds per hour* and 11.68 tons per year (TPY).</p> <p>Particulate emissions (PE) shall not exceed 0.05 pound per hour* and 0.17 ton per year (TPY).</p> <p>PE = PM10*</p> <p>This emission limitation is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limitation.</p> <p>See terms and conditions A.I.2.b and A.II.1 through II.3.</p> <p>Visible particulate emissions from any stack shall not exceed 10 percent opacity, as a six-minute average, except as specified by rule.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).</p>
OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-07(G)(2)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-31-05(C)	See term and condition A.I.2.c.

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a permanent total enclosure followed by a catalytic thermal oxidizer with a 95% destruction efficiency, material usage limitation, visible emission limitation and mass emission limitations.

**2.b** The permittee shall control OC emissions from this emissions unit by use of a permanent total enclosure followed by a catalytic thermal oxidizer with a destruction efficiency of at least 95% by weight.

**2.c** 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 R015 (Spray booth 5), R013 (Spray booth 3), R012 (Spray booth 2), R011 (Spray booth 1), P014 (Glass Department), K006 (Side light line), K004 (Door line #3), K003 (Door line #2), K011 (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 already has existing HAPs records, therefore, HAP emission limitations for the first 12 months of operation following the issuance of this permit are not required.

**2.d** The permittee has the option to perform an additional demonstration to show that the permanent total enclosure (PTE) cannot be compromised when the emissions unit is in operation (i.e. air flow through the PTE to the control device which is always maintained under negative pressure even when all the additional egress points which could effect the PTE were opened,) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If it can be demonstrated to the satisfaction of the Hamilton County Department of Environmental Services that the PTE cannot be compromised when the emissions unit is in operation, the permittee shall not be required to comply with the monitoring, record-keeping and reporting requirements of the differential pressure at the PTE, as specified below to ensure the ongoing integrity of the PTE.

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If the permittee elects not to perform the additional demonstration to show that the PTE cannot be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee will be required to comply with the differential pressure operational restriction, monitoring, recordkeeping and reporting requirements specified below (see sections A.II.1, A.III.2 and A.IV.3 below) to ensure the ongoing integrity of the PTE.

**II. Operational Restrictions**

1. The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, whenever the emissions unit is in operation.
2. The average temperature of the exhaust gasses immediately before the catalyst bed, for any 3-hour block of time while the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.
3. The maximum annual OC input of coatings, thinner and clean-up material employed in emissions unit K011 shall not exceed 467,200 pounds per year, as applied. The OC input shall be determined by multiplying the number of gallons of coating and ink, thinner and clean-up material employed per month by the OC content of each coating and ink, thinner and clean-up material, in pounds per gallon. The annual usage limitations are based upon a summation of the monthly usage figures. The OC input of coatings, thinner and clean-up material is based upon the premise that 100% of the solvent contained within the coatings, thinner and clean-up material is emitted.
4. The catalytic thermal oxidizer shall be operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals. The OC conversion efficiency of the catalyst in the catalytic thermal oxidizer, as determined by the catalyst activity testing, shall be at least 95%, at a test temperature that is representative of the normal temperature at the catalyst bed inlet. Solvent loading during the catalyst analysis shall be consistent with the test laboratory's normal testing protocol.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall operate and maintain continuous temperature monitors and recorder(s) which measure and record(s) the temperature immediately before the catalyst bed when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of

Emissions Unit ID: K011

accurately measuring the desired parameter. The temperature monitors and recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information each day:

- a. A log of downtime\*\* for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. The permittee may use the current temperature chart as the log documenting

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that the monitoring equipment and control device are operating. Each bypass of the collection system and/or control device shall be logged as to the date and time; and

\*\* The control device downtime is defined as any time when the emissions unit is in operation, employing organic compounds and the catalytic thermal oxidizer is not in operation. Monitoring equipment downtime is defined as any time when the emissions unit is in operation, employing organic compounds and the temperature monitoring equipment is not functioning.

b. All 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gasses immediately before the catalyst bed was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

2. The permittee shall install, maintain and operate monitoring devices and a recorder which simultaneously measure and record the differential pressure between the pressure inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals, with changes as deemed necessary by the permittee.

The permittee shall record and maintain the following information on a daily basis:

- a. The difference in pressure between the permanent total enclosure and the surrounding area(s); and
  - b. A log or record of operating time for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. The permittee shall maintain monthly records of the following information for this emissions unit:
    - a. The name and identification number for each coating, thinner and clean-up material, as applied;
    - b. The OC content of each coating, thinner and clean-up material, in pounds per gallon, as applied;
    - c. The number of gallons of each coating, thinner and clean-up material employed;

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- d. The total OC input from all coatings, thinner and clean-up material, in pounds (b x c);
- e. The monthly emissions rate calculated as follows:

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monthly OC emissions = monthly OC input rate from all coatings and thinner \* (1-control efficiency during the most recent stack test that demonstrated compliance) plus clean-up material;

- f. The solids content of each coating, in percent by weight, as applied; and
- g. The coating density of each coating, in pounds per gallon, as applied.

These records shall be summarized at the end of each calendar year.

- 4. The permittee shall collect and record the following information each month for emissions units R015 (Spray booth 5), R013 (Spray booth 3), R012 (Spray booth 2), R011 (Spray booth 1), P014 (Glass Department), K006 (Side light line), K004 (Door line #3), K003 (Door line #2), K011 (Milltreat operations) and K008 (Paint booth):
  - a. The name and identification number of each coating employed;
  - b. The individual Hazardous Air Pollutant (HAP)<sup>\*\*\*</sup> 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/thinner, 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];

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- 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];

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- 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.

5. The permittee shall perform an inspection of the catalytic thermal oxidizer, including the catalyst bed on at least an annual basis. Each inspection shall consist of internal and visual inspections in accordance with the manufacturer's recommendations and shall include a physical inspection of the unit and checks of associated equipment, including but not limited to burners, controls, dampers, valves and monitoring and recording equipment. Repair and replacement of equipment shall be performed as determined by the inspection. In accordance with the testing scheduled in section A.V.12 a sample of catalyst material shall be collected from the catalyst bed to perform the catalyst activity tests required in section A.V.12.

6. The permittee shall maintain a record of the results of each annual inspection of the catalytic oxidizer as well as the results of each catalyst activity test required in section A.V.12.

**IV. Reporting Requirements**

- 1. The permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gasses immediately before the catalyst bed (as determined by the continuous temperature monitor) did not comply with the temperature limitation specified in A.II.2.
- 2. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device and monitoring equipment when the associated emissions unit was in operation.
- 3. The permittee shall submit quarterly pressure differential deviation (excursion) reports that identify all periods of time during which the permanent total enclosure was not maintained at the required differential pressure specified in term A.II.1.

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4. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
5. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which specify the total OC emissions from emissions unit K011 for the previous calendar year. This report shall also specify the total OC input, in pounds, of coatings, thinner and clean-up material employed in emissions unit K011 for the previous calendar year. These reports shall be submitted by January 31 of each year.
6. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations set forth in term A.I.2.c.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by January 31, April 30, July 31 and October 31 of each year and shall cover the previous three calendar months ( October through December, January through March, April through June and July through September, respectively) .

If no exceedances occurred, the permittee shall state so in the report.

7. The permittee shall submit reports that include the results of the catalyst activity tests required in section A.V.12. These reports shall be submitted within 45 days after each catalyst activity test is performed.

**V. Testing Requirements**

1. Emission Limitations:  
Organic compound (OC) emissions shall not exceed 11.68 tons per year (TPY).

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon the record-keeping in term A.III.3. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the inks and coatings, thinners and clean-up material. The annual emission rate shall be determined by summing the monthly OC emissions then dividing by 2000 which yields the emission rate in tons per year.

2. Emission Limitations:  
Particulate emissions (PE) shall not exceed 0.05 pound per hour and 0.17 ton per year (TPY).

**Pella Entry Systems**

**Facility ID: 1409030092**

**RTI Application: 1405501**

Emissions Unit ID: K011

PE=PM10

**Applicable Compliance Methods:**

The pound per hour emission limitation is based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with this limitation. Formulation data shall be used to determine the solids contents of the coatings. The annual emission rate shall be determined by the product of the solids content times the coating density times one minus the transfer efficiency times one minus the control efficiency times the number of gallons of coating applied divided by 2000 which yields the emission rate in tons per year.

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3. Emission Limitation:  
Organic compound (OC) emissions shall not exceed 7.4 pounds per hour.

Applicable Compliance Method:

Compliance with the hourly OC emission limitation outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the PTI application 14-05564 submitted 08/24/04 and the addendum submitted 10/15/04. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the inks and coatings, thinners and clean-up material.

4. Emission Limitation:  
10% opacity as a six minute average

Applicable Compliance Method:

If required, compliance with the visible emission limitation stated in term and condition A.I.1 shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

5. Emission Limitation:  
95% OC destruction efficiency for the catalytic thermal oxidizer.

Applicable Compliance Method:

Compliance with this emission limitation shall be based upon on the results of emission testing conducted in accordance with the methods established in 40 CFR Part 60, Appendix A.

6. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within 6 months after the startup of the emissions unit.
  - b. The emission testing shall be conducted to demonstrate compliance with the OC destruction efficiency for the catalytic thermal oxidizer of 95%, by weight and to verify the 100% capture efficiency.
  - c. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency rate(s): Method 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval

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from the Ohio EPA. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10 or the approved alternative test protocol (e.g., "the mass balance protocol approved on 10/25/95). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and

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information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the

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test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

7. Material Usage Limitation;  
467,200 pounds per year OC input.;

Applicable Compliance Methods

Compliance with the OC input limitation in term and condition A.II.3 shall be demonstrated by the record keeping in term and condition A.III.3.

8. Operational Restriction:  
The permanent total enclosure shall be maintained under negative pressure, at a minimum pressure differential that is not less than 0.007 inches of water, whenever the emissions unit is in operation.

Applicable Compliance Method:

Compliance with this operational limitation shall be based upon either the monitoring in term and condition A.III.2 or the approved demonstration test per term and condition A.I.2.d.

9. Operational restriction:  
The average temperature of the exhaust gasses immediately before the catalyst bed for any 3-hour block of time while the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emission unit was in compliance.

Applicable Compliance Method:

Compliance with this operational limitation shall be based upon the monitoring in term and condition A.III.1.

10. 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 emission limitations cited in term and condition A.I.2.c shall be demonstrated by the recordkeeping in term and condition A.III.4.

11. Operational Restriction:  
The catalytic thermal oxidizer shall be operated and maintained in accordance with the

Emissions Unit ID: K011

manufacturer's recommendations, instructions and operating manuals. The OC conversion efficiency of the catalyst in the catalytic thermal oxidizer, as determined by the catalyst activity testing, shall be at least 90% at a test temperature that is representative of the normal temperature at the catalyst bed inlet. Solvent loading during the catalyst analysis shall be consistent with the test laboratory's normal testing protocol.

Applicable Compliance Method:

Compliance with this operational limitation shall be based upon testing conducted in accordance with A.V.12.

12. The permittee shall conduct, or have conducted, catalyst activity testing using the catalyst sample collected during the annual inspection described in section A.III. An intent to test notification shall not be required for the testing noted in this term. The procedures for the catalyst activity test shall be in accordance with the manufacturer's recommendations.

## **VI. Miscellaneous Requirements**

1. The terms and conditions of this Permit to Install supersede the terms and conditions of Permit to Install 14-05564 as issued on November 16, 2004 and modified on April 19, 2005.

**Issued: To be entered upon final issuance**

**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 - (K011) - Milltreat Operations - Spray booth with catalytic thermal oxidizer - modification**

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**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous 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 compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply

Emissions Unit ID: K011

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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 changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed threshold limit value (TLV) to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

**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 - (P015) - Woodworking equipment - molder and jamb prep controlled by fabric filter - modification**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 1.5 pounds per hour and 6.61 tons per year (TPY).  PE = PM10  The hourly and annual emission limitations are based on the emissions unit's Potential to Emit, therefore no hourly or annual records are required to demonstrate compliance with these limitations  See term and condition A.I.2.b.
OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a fabric filter with a 99.9% control efficiency, the visible emission limitation, and the mass emission limitations.
- 2.b Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six minute average, except as specified by rule.

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**II. Operational Restrictions**

1. The pressure drop across the fabric filter shall be maintained within the range recommended by the manufacturer while the emissions unit is in operation. Documentation of this range shall be submitted to the Department of Environmental Services prior to the startup of this emissions unit.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the fabric filter, while the emission unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s) with any modifications deemed necessary by the permittee. The permittee shall record the pressure drop across the fabric filter on a weekly basis when the fabric filter is being employed to control particulate emissions.

**IV. Reporting Requirements**

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the fabric filter was being employed for controlling particulate emissions and the pressure drop across the fabric filter did not comply with the allowable range specified in term A.II.1
2. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

**V. Testing Requirements**

1. Emission Limitations:  
Particulate emissions (PE) shall not exceed 1.5 pounds per hour and 6.61 tons per year (TPY).

PE = PM10

Applicable Compliance Method:

Compliance with these emission limitations shall be based upon the emissions unit's maximum throughput, 95% capture efficiency for molder and 50% capture efficiency for jamb prep and 99.9 % control efficiency for fabric filter.

2. Emission Limitation:

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20% opacity as a six minute average.

Applicable Compliance Method:

If required, compliance with the visible emission limitation stated in term and condition A.I.1 shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

3. Compliance with the operational restriction in A.II.1 shall be demonstrated by the monitoring in term and condition A.III.1 and reporting in A.IV.1.

**VI. Miscellaneous Requirements**

1. The terms and conditions of this Permit to Install supersede the terms and conditions of Permit to Install 14-05564 as issued on November 16, 2004 and modified on April 19, 2005.

**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 - (P015) - Woodworking equipment - molder and jamb prep controlled by fabric filter - modification**

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**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None