State of Ohio Environmental Protection Agency

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

Street Address:
122 S. Front Street

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

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 14-05643
Fac ID: 1431071007
DATE: 5/18/2006

Wine Cellar Innovations
James Deckebach
4575 Eastern Ave
Cincinnati, OH 45226

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **HCDES**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install **Issue Date: 5/18/2006**
Terms and Conditions **Effective Date: 5/18/2006**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-05643

Application Number:	14-05643
Facility ID:	1431071007
Permit Fee:	**$500**
Name of Facility:	Wine Cellar Innovations
Person to Contact:	James Deckebach
Address:	4575 Eastern Ave Cincinnati, OH 45226

Location of proposed air contaminant source(s) [emissions unit(s)]:
4575 Eastern Avenue
Cincinnati, **Ohio**

Description of proposed emissions unit(s):
Administrative Modification to PTI 14-05643 to reduce the VOC emissions from the paint spray booth and four dip tanks.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install 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 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 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 quarterly, i.e., 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install 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.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

15. 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 this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
PM	5.00
PM_{10}	1.60
OC	15.0
Single HAP	9.9
Combined HAPs	24.9

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
F001 - Sawdust Loadout	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) from material handling shall not exceed 1.71 lbs/hour and 5.00 tons/yr. Emissions of particulate matter 10 microns and less (PM10) shall not exceed 0.55 lb/hr and 1.60 tons/yr. See terms A.2.a. - A.2.c., B.1 and B.2. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B).
	OAC rule 3745-17-07(B)(1)	Visible particulate emissions of fugitive dust shall not exceed 20% opacity, as a three-minute average, except as specified by rule.
	OAC rule 3745-17-08(B)	Best available control measures that are sufficient to minimize or

eliminate visible emissions of fugitive dust (see term and condition A.2.b.)

2. Additional Terms and Conditions

2.a The material handling operation(s) that are covered by this permit and subject to the above-mentioned requirements are listed below:

Sawdust loadout operation, as described in the PTI 14-05643 application received on October 29, 2004.

2.b The permittee shall employ best available control measures for the above-identified material handling operation(s) for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

material handling operation(s)	control measure(s)
Sawdust loadout	a combination of precautionary measures and building enclosure.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2.c Implementation of the above-mentioned control measure(s) in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rules 3745-17-08 and 3745-31-05.

2.d The hourly emission limitations outlined in term A.1 for PE/PM10 are based on the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

B. Operational Restrictions

1. The maximum annual material throughput for this emissions unit shall not exceed 5005 tons of sawdust per year.

2. Material loaded onto trucks shall be performed within a building enclosure and the loading drop height shall be minimized sufficient to minimize visible emissions of fugitive dust.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the amount of sawdust unloaded.

D. Reporting Requirements

1. The permittee shall submit annual reports that identify the annual amount of sawdust loaded, in tons. These reports shall be submitted by January 31 of each year for the preceding calendar year.

E. Testing Requirements

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

a. Emission Limitation:

Particulate emissions (PE) from material handling shall not exceed 1.71 lbs/hour and 5.00 tons/yr.

Emissions of particulate matter less than 10 microns (PM10) shall not exceed 0.55 lb/hr and 1.60 tons/yr.

Applicable Compliance Method:

The hourly emission limitations are based upon the emission unit's potential to emit and the emissions data found in PTI application 14-05643, received October 29, 2004. Compliance with the annual limitations shall be demonstrated by the emission factors in RACM, Table 2-17-1, control efficiencies (if applicable), the operational parameters as submitted in PTI application 14-05643, received October 29, 2004, and the record keeping in Section C.1.

b. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20% opacity, as a three-minute average, except as specified by rule.

Applicable compliance method:

If required, compliance shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

2. Compliance with the amount of sawdust loadout limit in term and condition B.1 shall be determined by the required record keeping in term and condition C.1.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Paint Spray Booth 1 - Modification	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 3.0 tons per year (TPY). See term and condition A.2.a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day.
	OAC rule 3745-31-05(C)	See term and condition A.2.c
	OAC rule 3745-21-15	Exempt

2. Additional Terms and Conditions

2.a The OC content of each coating and cleanup material employed in this emissions unit shall not exceed 5.38 pounds of OC per gallon, as applied.

2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by

compliance with the OC content limitations, usage limitation and emissions limitations.

2.c The total usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from K001 (Paint Spray Booth 1), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4), and any registration status and/or permit exempt emissions units shall not exceed 9.9 TPY* for any single HAP, as a rolling, 12-month summation, and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

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

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

b. The individual 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 number of each cleanup material employed;

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

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

HAP contents from (f)];

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

i. The total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons [for each HAP, the sum of (b) times (d) for all coatings plus the sum of (f) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];

j. The total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons [the sum of (c) times (d) for all coatings plus the sum of (g) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];

k. The updated rolling, 12-month summation of usage for each individual HAP**, in 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 usage for the total combined HAPs**, in 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.

** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

2. The permittee shall collect and record the following information each day for emissions unit K001:

a. The company identification for each coating and cleanup material employed;

b. The number of gallons of each coating and cleanup material employed;

c. The OC content of each coating and cleanup material, in pounds of OC per gallon of coating or cleanup material;

d. The total OC emission rate for all coatings and cleanup materials, in pounds of OC emissions per day [summation of (b) x (c) for all coatings and cleanup materials];

e. The total number of hours the emissions unit was in operation; and

f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any

thinning solvents added at the emissions unit.].

3. The permittee shall collect and record the following information for each month for this emissions unit:

a. The total number of gallons of coatings and cleanup materials employed [summation of term and condition C.2.b for all days of the calendar month]; and

b. The total OC emissions from the coatings and cleanup materials employed, in lbs [summation of term and condition C.2.d for all days of the calendar month].

4. The permit to install for emissions units, K001 and R001-R004, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Xylene
TLV (ug/m^3): 434,192
Maximum Hourly Emission Rate (lbs/hr): 2.26
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m^3): 301
MAGLC (ug/m^3): 10,338

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

a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission

of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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

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

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

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

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

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

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

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that contain the following information:

a. An identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;

b. An identification of each day during which the OC emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day; and

c. An identification of any exceedance of the coating and cleanup material OC content limitation.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period, then a report is required stating so.

2. All quarterly deviation reports shall be submitted in accordance with paragraph A.2. of the General Terms and Conditions of this permit.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations outlined in term and condition A.2.c. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the following:

a. The total amount, in gallons, of coatings and cleanup materials employed for the calendar year; and

b. The total OC emissions from all coatings and cleanup materials employed, in tons, for the calendar year.

This report shall be submitted by January 31 of each year and cover the previous calendar year.

E. Testing Requirements

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

a. Emission Limitations:

8 lbs/hr, 40 lbs/day and 3.0 TPY of OC emissions from coatings and cleanup materials in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emissions limitations shall be determined by the record keeping requirements specified in terms and conditions C.2 and C.3.

b. Emission Limitation:

5.38 lbs of OC/gallon, for the coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the OC content limitation shall be determined by the record keeping requirements specified in terms and conditions C.2.

2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the materials, including cleanup materials, employed in this emissions unit.

3. Compliance with the HAP usage limitations specified in term and condition A.2.c shall be determined by the required record keeping in term and condition C.1.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1. - C.3., D. and E.

2. The terms and conditions of this permit to install shall supercede the terms and conditions of Permit to Install 14-05643 as issued on November 17, 2005.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R001 - Wood Coating Dip Tank 1 - Modification	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 3.0 tons per year (TPY). See term and condition A.2.a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day.
	OAC rule 3745-31-05(C)	See term and condition A.2.c
	OAC rule 3745-21-15	Exempt

2. Additional Terms and Conditions

2.a The OC content of each coating and cleanup material employed in this emissions unit shall not exceed 6.48 pounds of OC per gallon, as applied.

2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by

compliance with the OC content limitations, usage limitation and emissions limitations.

2.c The total usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from K001 (Paint Spray Booth 1), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4), and any registration status and/or permit exempt emissions units shall not exceed 9.9 TPY* for any single HAP, as a rolling, 12-month summation, and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

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

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

b. The individual 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 number of each cleanup material employed;

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

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

HAP contents from (f)];

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

i. The total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons [for each HAP, the sum of (b) times (d) for all coatings plus the sum of (f) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];

j. The total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons [the sum of (c) times (d) for all coatings plus the sum of (g) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];

k. The updated rolling, 12-month summation of usage for each individual HAP**, in 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 usage for the total combined HAPs**, in 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.

** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

2. The permittee shall collect and record the following information each day for emissions unit R001:

a. The company identification for each coating and cleanup material employed;

b. The number of gallons of each coating and cleanup material employed;

c. The OC content of each coating and cleanup material, in pounds of OC per gallon of coating or cleanup material;

d. The total OC emission rate for all coatings and cleanup materials, in pounds of

OC emissions per day [summation of (b) x (c) for all coatings and cleanup materials];

e. The total number of hours the emissions unit was in operation; and

f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

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

3. The permittee shall collect and record the following information for each month for this emissions unit:

a. The total number of gallons of coatings and cleanup materials employed [summation of term and condition C.2.b for all days of the calendar month]; and

b. The total OC emissions from the coatings and cleanup materials employed, in lbs [summation of term and condition C.2.d for all days of the calendar month].

4. The permit to install for emissions units, K001 and R001-R004, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Xylene
TLV (ug/m^3): 434,192
Maximum Hourly Emission Rate (lbs/hr): 2.26
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m^3): 301
MAGLC (ug/m^3): 10,338

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

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

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

c. Physical changes to the emissions unit or its exhaust parameters (e.g.,

increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

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

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

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

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that contain the following information:

a. An identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;

b. An identification of each day during which the OC emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day; and

c. An identification of any exceedance of the coating and cleanup material OC content limitation.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period, then a report is required stating so.

2. All quarterly deviation reports shall be submitted in accordance with paragraph A.2. of the General Terms and Conditions of this permit.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations outlined in term and condition A.2.c. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the following:

a. The total amount, in gallons, of coatings and cleanup materials employed for the calendar year; and

b. The total OC emissions from all coatings and cleanup materials employed, in tons, for the calendar year.

This report shall be submitted by January 31 of each year and cover the previous calendar year.

E. Testing Requirements

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

a. Emission Limitations:

8 lbs/hr, 40 lbs/day and 3.0 TPY of OC emissions from coatings and cleanup materials in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emissions limitations shall be determined by the record

keeping requirements specified in terms and conditions C.2 and C.3.

b. Emission Limitation:

6.48 lbs of OC/gallon, for the coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the OC content limitation shall be determined by the record keeping requirements specified in terms and conditions C.2.

2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the materials, including cleanup materials, employed in this emissions unit.

3. Compliance with the HAP usage limitations specified in term and condition A.2.c shall be determined by the required record keeping in term and condition C.1.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1. - C.3., D. and E.

2. The terms and conditions of this permit to install shall supercede the terms and conditions of Permit to Install 14-05643 as issued on November 17, 2005.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R002 - Wood Coating Dip Tank 2 - Modification	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 3.0 tons per year (TPY). See term and condition A.2.a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day.
	OAC rule 3745-31-05(C)	See term and condition A.2.c
	OAC rule 3745-21-15	Exempt

2. Additional Terms and Conditions

2.a The OC content of each coating and cleanup material employed in this emissions unit shall not exceed 6.48 pounds of OC per gallon, as applied.

2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by

compliance with the OC content limitations, usage limitation and emissions limitations.

2.c The total usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from K001 (Paint Spray Booth 1), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4), and any registration status and/or permit exempt emissions units shall not exceed 9.9 TPY* for any single HAP, as a rolling, 12-month summation, and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

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

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

b. The individual 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 number of each cleanup material employed;

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

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

HAP contents from (f)];

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

i. The total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons [for each HAP, the sum of (b) times (d) for all coatings plus the sum of (f) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];

j. The total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons [the sum of (c) times (d) for all coatings plus the sum of (g) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];

k. The updated rolling, 12-month summation of usage for each individual HAP**, in 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 usage for the total combined HAPs**, in 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.

** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

2. The permittee shall collect and record the following information for each day for emissions unit R002:

a. The company identification for each coating and cleanup material employed;

b. The number of gallons of each coating and cleanup material employed;

c. The OC content of each coating and cleanup material, in pounds of OC per gallon of coating or cleanup material;

d. The total OC emission rate for all coatings and cleanup materials, in pounds of OC emissions per day [summation of (b) x (c) for all coatings and cleanup materials];

e. The total number of hours the emissions unit was in operation; and

f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

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

3. The permittee shall collect and record the following information for each month for this emissions unit:

a. The total number of gallons of coatings and cleanup materials employed [summation of term and condition C.2.b for all days of the calendar month]; and

b. The total OC emissions from the coatings and cleanup materials employed, in lbs [summation of term and condition C.2.d for all days of the calendar month].

4. The permit to install for emissions units, K001 and R001-R004, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Xylene
TLV (ug/m^3): 434,192
Maximum Hourly Emission Rate (lbs/hr): 2.26
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m^3): 301
MAGLC (ug/m^3): 10,338

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

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

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

c. Physical changes to the emissions unit or its exhaust parameters (e.g.,

increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

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

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

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

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that contain the following information:

a. An identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;

b. An identification of each day during which the OC emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day; and

c. An identification of any exceedance of the coating and cleanup material OC content limitation.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period, then a report is required stating so.

2. All quarterly deviation reports shall be submitted in accordance with paragraph A.2. of the General Terms and Conditions of this permit.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations outlined in term and condition A.2.c. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the following:

a. The total amount, in gallons, of coatings and cleanup materials employed for the calendar year; and

b. The total OC emissions from all coatings and cleanup materials employed, in tons, for the calendar year.

This report shall be submitted by January 31 of each year and cover the previous calendar year.

E. Testing Requirements

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

a. Emission Limitations:

8 lbs/hr, 40 lbs/day and 3.0 TPY of OC emissions from coatings and cleanup materials in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emissions limitations shall be determined by the record

keeping requirements specified in terms and conditions C.2 and C.3.

b. Emission Limitation:

6.48 lbs of OC/gallon, for the coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the OC content limitation shall be determined by the record keeping requirements specified in terms and conditions C.2.

2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the materials, including cleanup materials, employed in this emissions unit.

3. Compliance with the HAP usage limitations specified in term and condition A.2.c shall be determined by the required record keeping in term and condition C.1.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1. - C.3., D. and E.

2. The terms and conditions of this permit to install shall supercede the terms and conditions of Permit to Install 14-05643 as issued on November 17, 2005.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R003 - Wood Coating Dip Tank 3 - Modification	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 3.0 tons per year (TPY). See term and condition A.2.a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day.
	OAC rule 3745-31-05(C)	See term and condition A.2.c
	OAC rule 3745-21-15	Exempt

2. Additional Terms and Conditions

2.a The OC content of each coating and cleanup material employed in this emissions unit shall not exceed 6.48 pounds of OC per gallon, as applied.

2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by

compliance with the OC content limitations, usage limitation and emissions limitations.

2.c The total usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from K001 (Paint Spray Booth 1), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4) and any registration status and/or permit exempt emissions units shall not exceed 9.9 TPY* for any single HAP, as a rolling, 12-month summation, and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

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

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

b. The individual 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 number of each cleanup material employed;

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

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

HAP contents from (f)];

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

i. The total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons [for each HAP, the sum of (b) times (d) for all coatings plus the sum of (f) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];

j. The total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons [the sum of (c) times (d) for all coatings plus the sum of (g) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];

k. The updated rolling, 12-month summation of usage for each individual HAP**, in 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 usage for the total combined HAPs**, in 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.

** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

2. The permittee shall collect and record the following information each day for emissions unit R003:

a. The company identification for each coating and cleanup material employed;

b. The number of gallons of each coating and cleanup material employed;

c. The OC content of each coating and cleanup material, in pounds of OC per gallon of coating or cleanup material;

d. The total OC emission rate for all coatings and cleanup materials, in pounds of OC emissions per day [summation of (b) x (c) for all coatings and cleanup materials];

e. The total number of hours the emissions unit was in operation; and

f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

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

3. The permittee shall collect and record the following information for each month for this emissions unit:

a. The total number of gallons of coatings and cleanup materials employed [summation of term and condition C.2.b for all days of the calendar month]; and

b. The total OC emissions from the coatings and cleanup materials employed, in lbs [summation of term and condition C.2.d for all days of the calendar month].

4. The permit to install for emissions units, K001 and R001-R004, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Xylene
TLV (ug/m^3): 434,192
Maximum Hourly Emission Rate (lbs/hr): 2.26
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m^3): 301
MAGLC (ug/m^3): 10,338

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

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

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

c. Physical changes to the emissions unit or its exhaust parameters (e.g.,

increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

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

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

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

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that contain the following information:

a. An identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;

b. An identification of each day during which the OC emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day; and

c. An identification of any exceedance of the coating and cleanup material OC content limitation.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period, then a report is required stating so.

2. All quarterly deviation reports shall be submitted in accordance with paragraph A.2. of the General Terms and Conditions of this permit.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations outlined in term and condition A.2.c. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the following:

a. The total amount, in gallons, of coatings and cleanup materials employed for the calendar year; and

b. The total OC emissions from all coatings and cleanup materials employed, in tons, for the calendar year.

This report shall be submitted by January 31 of each year and cover the previous calendar year.

E. Testing Requirements

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

a. Emission Limitations:

8 lbs/hr, 40 lbs/day and 3.0 TPY of OC emissions from coatings and cleanup materials in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emissions limitations shall be determined by the record

keeping requirements specified in terms and conditions C.2 and C.3.

b. Emission Limitation:

6.48 lbs of OC/gallon, for the coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the OC content limitation shall be determined by the record keeping requirements specified in terms and conditions C.2.

2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the materials, including cleanup materials, employed in this emissions unit.

3. Compliance with the HAP usage limitations specified in term and condition A.2.c shall be determined by the required record keeping in term and condition C.1.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1. - C.3., D. and E.

2. The terms and conditions of this permit to install shall supercede the terms and conditions of Permit to Install 14-05643 as issued on November 17, 2005.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R004 - Wood Coating Dip Tank 4 - Modification	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 3.0 tons per year (TPY). See term and condition A.2.a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(C) and 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day.
	OAC rule 3745-31-05(C)	See term and condition A.2.c
	OAC rule 3745-21-15	Exempt

2. Additional Terms and Conditions

2.a The OC content of each coating and cleanup material employed in this emissions unit shall not exceed 6.48 pounds of OC per gallon, as applied.

2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by

compliance with the OC content limitations, usage limitation and emissions limitations.

2.c The total usage of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from K001 (Paint Spray Booth 1), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4), and any registration status and/or permit exempt emissions units shall not exceed 9.9 TPY* for any single HAP, as a rolling, 12-month summation, and 24.9 TPY* for any combination of HAPs, as a rolling, 12-month summation.

* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

B. Operational Restrictions

None

C. Monitoring and/or Record keeping Requirements

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

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

b. The individual 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 number of each cleanup material employed;

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

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

HAP contents from (f)];

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

i. The total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons [for each HAP, the sum of (b) times (d) for all coatings plus the sum of (f) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];

j. The total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons [the sum of (c) times (d) for all coatings plus the sum of (g) times (h) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];

k. The updated rolling, 12-month summation of usage for each individual HAP**, in 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 usage for the total combined HAPs**, in 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.

** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

2. The permittee shall collect and record the following information each day for emissions unit R004:

a. The company identification for each coating and cleanup material employed;

b. The number of gallons of each coating and cleanup material employed;

c. The OC content of each coating and cleanup material, in pounds of OC per gallon of coating or cleanup material;

d. The total OC emission rate for all coatings and cleanup materials, in pounds of OC emissions per day [summation of (b) x (c) for all coatings and cleanup materials];

e. The total number of hours the emissions unit was in operation; and

f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

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

3. The permittee shall collect and record the following information for each month for this emissions unit:

a. The total number of gallons of coatings and cleanup materials employed [summation of term and condition C.2.b for all days of the calendar month]; and

b. The total OC emissions from the coatings and cleanup materials employed, in lbs [summation of term and condition C.2.d for all days of the calendar month].

4. The permit to install for emissions units, K001 and R001-R004, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

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

Pollutant: Xylene
TLV (ug/m^3): 434,192
Maximum Hourly Emission Rate (lbs/hr): 2.26
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m^3): 301
MAGLC (ug/m^3): 10,338

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

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

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

c. Physical changes to the emissions unit or its exhaust parameters (e.g.,

increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

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

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

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

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that contain the following information:

a. An identification of each day during which the average hourly OC emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;

b. An identification of each day during which the OC emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day; and

c. An identification of any exceedance of the coating and cleanup material OC content limitation.

The reports shall identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period, then a report is required stating so.

2. All quarterly deviation reports shall be submitted in accordance with paragraph A.2. of the General Terms and Conditions of this permit.

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emissions limitations outlined in term and condition A.2.c. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

4. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services that specify the following:

a. The total amount, in gallons, of coatings and cleanup materials employed for the calendar year; and

b. The total OC emissions from all coatings and cleanup materials employed, in tons, for the calendar year.

This report shall be submitted by January 31 of each year and cover the previous calendar year.

E. Testing Requirements

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

a. Emission Limitations:

8 lbs/hr, 40 lbs/day and 3.0 TPY of OC emissions from coatings and cleanup materials in this emissions unit.

Applicable Compliance Method:

Compliance with the OC emissions limitations shall be determined by the record

keeping requirements specified in terms and conditions C.2 and C.3.

b. Emission Limitation:

6.48 lbs of OC/gallon, for the coatings and cleanup materials.

Applicable Compliance Method:

Compliance with the OC content limitation shall be determined by the record keeping requirements specified in terms and conditions C.2.

2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the OC contents of the materials, including cleanup materials, employed in this emissions unit.

3. Compliance with the HAP usage limitations specified in term and condition A.2.c shall be determined by the required record keeping in term and condition C.1.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1. - C.3., D. and E.

2. The terms and conditions of this permit to install shall supercede the terms and conditions of Permit to Install 14-05643 as issued on November 17, 2005.