

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install: 14-05872

A. Source Description:

Wine Cellar Innovations makes wine racks and custom wood cabinetry. Planks of wood are shipped to the facility and cut to specification. Each rack is pre-assembled initially, then taken apart, coated with stain and air dried. Finally, the facility will reconstruct the wine rack in the customer's chosen location.

B. Facility Emissions and Attainment Status:

The facility has the following emissions units, once this permit is issued: F001(Sawdust Loadout); K001 through K003 (3 Paint Spray Booths) and R001 through R006 (6 Wood Coating Dip Tanks). The permittee has requested to incorporate federally enforceable limitations in this air Permit to Install (PTI) limiting the Hazardous Air Pollutants (HAP) emissions to less than major source thresholds. The facility is located in Hamilton County which is currently non-attainment for Volatile Organic Compounds (VOC) (8-hour ozone standard), non-attainment for PM 2.5 and attainment for all other criteria pollutants.

C. Source Emissions:

The HAP emissions will not exceed 9.9 TPY for any individual HAP and 24.9 TPY for combined HAPs. Also, the facility wide VOC emissions are restricted to 24.9 TPY. The Potential to Emit for the new emission units is 7.3 TPY VOC each for a total of 29.2 TPY of VOC, which is below the major source non-attainment new source review threshold of 100 TPY.

D. Conclusion:

The terms and conditions in this permit application will limit the HAP emissions to 9.9 TPY for any individual HAP and 24.9 TPY for combined HAPs as well as limit the facility wide VOC emissions to 24.9 TPY. Compliance with the emission limitations will be based on a rolling, 12-month summation. The facility will be required to maintain daily usage and emissions records and submit reports on quarterly basis to determine compliance. The facility-wide HAP emissions will be limited to 9.9 TPY for any individual HAP and 24.9 TPY for combined HAPs and hence the facility is exempt from Title V permit requirements. The facility-wide VOC emissions are limited to 24.9 TPY and hence the facility is exempt from RACT requirements in OAC rule 3745-21-15. These facility-wide emission limitations were previously established under earlier PTI's and will be maintained with the issuance of this permit.



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov. Center

Application No: 14-05872

Fac ID: 1431071007

DATE: 10/19/2006

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

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

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

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

Sincerely,

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

CC: USEPA

HCDES

OH-KY-IN Reg Council of Govs

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IN

HAMILTON COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-05872 FOR AN AIR CONTAMINANT SOURCE FOR
Wine Cellar Innovations**

On 10/19/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Wine Cellar Innovations**, located at **4575 Eastern Avenue, Cincinnati, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05872:

Permit to install two paint booths and two dip tanks.

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 Howard 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 PERMIT TO INSTALL 14-05872

Application Number: 14-05872
Facility ID: 1431071007
Permit Fee: **To be entered upon final issuance**
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):
Permit to install two paint booths and two dip tanks.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Wine Cellar Innovations

PTI Application: 14-05872

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 1431071007

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,

Wine Cellar Innovations

Facility ID: 1431071007

PTI Application: 14-05872

Issued: To be entered upon final issuance

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

Wine Cellar Innovations

Facility ID: 1431071007

PTI Application: 14-05872

Issued: To be entered upon final issuance

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

Wine Cellar Innovations

Facility ID: 1431071007

PTI Application: 14-05872

Issued: To be entered upon final issuance

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

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

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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 - (K002) - Paint spray booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 8 lbs/hr and 40 lbs/day.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B)(1) and 3745-21-15.</p>
OAC rule 3745-35-07(B)(1) Synthetic minor to avoid Title V permitting	See term and condition A.2.b.
OAC rule 3745-31-02(A)(2) Voluntary restriction to avoid OAC rule 3745-21-15	See term and condition A.2.c.
OAC rule 3745-21-15	Exempt: The facility-wide total VOC emissions are restricted to 24.9 TPY.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations.
- 2.b 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), K002 (Paint Spray Booth 2), K003 (Paint Spray Booth 3), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4), R005 (Wood Coating Dip Tank 5), R006 (Wood Coating Dip Tank 6) 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.

Emissions Unit ID: **K002**

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

The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.

- 2.c** The facility-wide total volatile organic compound (VOC) emissions, including emissions units K001 (Paint Spray Booth 1), K002 (Paint Spray Booth 2), K003 (Paint Spray Booth 3), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4), R005 (Wood Coating Dip Tank 5), R006 (Wood Coating Dip Tank 6) and any registration status and/or permit exempt emissions units, shall not exceed 24.9 TPY on a rolling, 12-month summation basis.

The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.b:
 - a. The name and identification number of each coating employed;
 - b. The individual 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;

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- 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 this emissions unit:
 - 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 VOC content of each coating and cleanup material, in pounds of VOC per gallon of coating or cleanup material;

Emissions Unit ID: **K002**

- d. The total VOC emission rate for all coatings and cleanup materials, in pounds of VOC 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 VOC 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 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 total volatile organic compound (VOC) content in pounds per gallon in each coating, as applied;
 - c. The number of gallons of each coating employed;
 - d. The name and identification number of each cleanup material employed;
 - e. The total volatile organic compound (VOC) content in pounds per gallon in each cleanup material, as applied;
 - f. The number of gallons of each cleanup material employed;
 - g. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons [the sum of (b) times (c) for all coatings plus the sum of (e) times (f) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];
 - h. The updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.
4. The permit to install for emissions units K002 and K003 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"

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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: 2-Butoxyethanol

TLV (ug/m³): 96,663

Maximum Allowable Hourly Emission Rate (lbs/hr): 0.48

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 316

MAGLC (ug/m³): 2301

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

Emissions Unit ID: **K002**

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 its 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 VOC emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly VOC emissions for each such day; and
 - b. An identification of each day during which the VOC emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual VOC emissions for each such day.

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.

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3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. 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 notify the Hamilton County Department of Environmental Services of any exceedance of the VOC emission limitation 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.)

E. Testing Requirements

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

Emission Limitations:

8 lbs/hr and 40 lbs/day of VOC emissions from coatings and cleanup materials in this emissions unit.

Applicable Compliance Method:

Compliance with the VOC emission limitations shall be determined by the record keeping requirements specified in term and condition C.2.

2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the VOC 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.b shall be determined by the required record keeping in term and condition C.1.
4. Compliance with the VOC emission limitations specified in term and condition A.2.c shall be determined by the required record keeping in term and condition C.3.

F. Miscellaneous Requirements

Wine Cellar Innovations

DTI Application: 14-05972

Facility ID: 1431071007

Emissions Unit ID: **K002**

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

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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 - (K003) - Paint spray booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 8 lbs/hr and 40 lbs/day.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B)(1) and 3745-21-15.</p>
OAC rule 3745-35-07(B)(1) Synthetic minor to avoid Title V permitting	See term and condition A.2.b.
OAC rule 3745-31-02(A)(2) Voluntary restriction to avoid OAC rule 3745-21-15	See term and condition A.2.c.
OAC rule 3745-21-15	Exempt: The facility-wide total VOC emissions are restricted to 24.9 TPY.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations.
- 2.b 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), K002 (Paint Spray Booth 2), K003 (Paint Spray Booth 3), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4), R005 (Wood Coating Dip Tank 5), R006 (Wood Coating Dip Tank 6) 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.

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

The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.

- 2.c** The facility-wide total volatile organic compound (VOC) emissions, including emissions units K001 (Paint Spray Booth 1), K002 (Paint Spray Booth 2), K003 (Paint Spray Booth 3), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4), R005 (Wood Coating Dip Tank 5), R006 (Wood Coating Dip Tank 6) and any registration status and/or permit exempt emissions units, shall not exceed 24.9 TPY on a rolling, 12-month summation basis.

The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.b:
 - a. The name and identification number of each coating employed;
 - b. The individual 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 this emissions unit:
 - 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 VOC content of each coating and cleanup material, in pounds of VOC per gallon of coating or cleanup material;

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- d. The total VOC emission rate for all coatings and cleanup materials, in pounds of VOC 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 VOC 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 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 total volatile organic compound (VOC) content in pounds per gallon in each coating, as applied;
 - c. The number of gallons of each coating employed;
 - d. The name and identification number of each cleanup material employed;
 - e. The total volatile organic compound (VOC) content in pounds per gallon in each cleanup material, as applied;
 - f. The number of gallons of each cleanup material employed;
 - g. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons [the sum of (b) times (c) for all coatings plus the sum of (e) times (f) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];
 - h. The updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.
- 4. The permit to install for emissions units K002 and K003 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

Emissions Unit ID: **K003**

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: 2-Butoxyethanol

TLV ($\mu\text{g}/\text{m}^3$): 96,663

Maximum Allowable Hourly Emission Rate (lbs/hr): 0.48

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 316

MAGLC ($\mu\text{g}/\text{m}^3$): 2301

Physical changes to or in the method of operation of the emissions unit after its 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

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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 its 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 VOC emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly VOC emissions for each such day; and
 - b. An identification of each day during which the VOC emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual VOC emissions for each such day.

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.

Emissions Unit ID: **K003**

3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. 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 notify the Hamilton County Department of Environmental Services of any exceedance of the VOC emission limitation 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.)

E. Testing Requirements

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

Emission Limitations:

8 lbs/hr and 40 lbs/day of VOC emissions from coatings and cleanup materials in this emissions unit.

Applicable Compliance Method:

Compliance with the VOC emission limitations shall be determined by the record keeping requirements specified in term and condition C.2.

2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the VOC 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.b shall be determined by the required record keeping in term and condition C.1.
4. Compliance with the VOC emission limitations specified in term and condition A.2.c shall be determined by the required record keeping in term and condition C.3.

F. Miscellaneous Requirements

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

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Emissions Unit ID: **K003**

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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 - (R005) - Dip tank

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 8 lbs/hr and 40 lbs/day.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B)(1) and 3745-21-15.</p>
OAC rule 3745-35-07(B)(1) Synthetic minor to avoid Title V permitting	See term and condition A.2.b.
OAC rule 3745-31-02(A)(2) Voluntary restriction to avoid OAC rule 3745-21-15	See term and condition A.2.c.
OAC rule 3745-21-15	Exempt: The facility-wide total VOC emissions are restricted to 24.9 TPY.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations.
- 2.b 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), K002 (Paint Spray Booth 2), K003 (Paint Spray Booth 3), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4), R005 (Wood Coating Dip Tank 5), R006 (Wood Coating Dip Tank 6) 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.

Emissions Unit ID: R005

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

The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.

- 2.c** The facility-wide total volatile organic compound (VOC) emissions, including emissions units K001 (Paint Spray Booth 1), K002 (Paint Spray Booth 2), K003 (Paint Spray Booth 3), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4), R005 (Wood Coating Dip Tank 5), R006 (Wood Coating Dip Tank 6) and any registration status and/or permit exempt emissions units, shall not exceed 24.9 TPY on a rolling, 12-month summation basis.

The permittee has existing records to demonstrate compliance with this emissions limitation upon permit issuance.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.b:
 - a. The name and identification number of each coating employed;
 - b. The individual 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;

Emissions Unit ID: **R005**

- 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 this emissions unit:
 - 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 VOC content of each coating and cleanup material, in pounds of VOC per gallon of coating or cleanup material;
 - d. The total VOC emission rate for all coatings and cleanup materials, in pounds of

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VOC 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 VOC 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 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 total volatile organic compound (VOC) content in pounds per gallon in each coating, as applied;
 - c. The number of gallons of each coating employed;
 - d. The name and identification number of each cleanup material employed;
 - e. The total volatile organic compound (VOC) content in pounds per gallon in each cleanup material, as applied;
 - f. The number of gallons of each cleanup material employed;
 - g. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons [the sum of (b) times (c) for all coatings plus the sum of (e) times (f) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];
 - h. The updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.
- 4. The permit to install for emissions units R005 and R006 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

Emissions Unit ID: **R005**

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: 1-Methoxy-2-propanol

TLV ($\mu\text{g}/\text{m}^3$): 368,589

Maximum Allowable Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 5311

MAGLC ($\mu\text{g}/\text{m}^3$): 8776

Physical changes to or in the method of operation of the emissions unit after its 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

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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 its 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 VOC emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly VOC emissions for each such day; and
 - b. An identification of each day during which the VOC emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual VOC emissions for each such day.

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

Emissions Unit ID: **R005**

of any exceedance of the HAP emission limitations outlined in term and condition A.2.b. 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 notify the Hamilton County Department of Environmental Services of any exceedance of the VOC emission limitation 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.)

E. Testing Requirements

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

Emission Limitations:

8 lbs/hr and 40 lbs/day of VOC emissions from coatings and cleanup materials in this emissions unit.

Applicable Compliance Method:

Compliance with the VOC emission limitations shall be determined by the record keeping requirements specified in term and condition C.2.

2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the VOC 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.b shall be determined by the required record keeping in term and condition C.1.
4. Compliance with the VOC emission limitations specified in term and condition A.2.c shall be determined by the required record keeping in term and condition C.3.

F. Miscellaneous Requirements

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

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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 - (R006) - Dip tank

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 8 lbs/hr and 40 lbs/day.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B)(1) and 3745-21-15.</p>
OAC rule 3745-35-07(B)(1) Synthetic minor to avoid Title V permitting	See term and condition A.2.b.
OAC rule 3745-31-02(A)(2) Voluntary restriction to avoid OAC rule 3745-21-15	See term and condition A.2.c.
OAC rule 3745-21-15	Exempt: The facility-wide total VOC emissions are restricted to 24.9 TPY.

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations.
- 2.b 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), K002 (Paint Spray Booth 2), K003 (Paint Spray Booth 3), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4), R005 (Wood Coating Dip Tank 5), R006 (Wood Coating Dip Tank 6) 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-

Emissions Unit ID: **R006**

month summation.

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

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

- 2.c** The facility-wide total volatile organic compound (VOC) emissions, including emissions units K001 (Paint Spray Booth 1), K002 (Paint Spray Booth 2), K003 (Paint Spray Booth 3), R001 (Wood Coating Dip Tank 1), R002 (Wood Coating Dip Tank 2), R003 (Wood Coating Dip Tank 3), R004 (Wood Coating Dip Tank 4), R005 (Wood Coating Dip Tank 5), R006 (Wood Coating Dip Tank 6) and any registration status and/or permit exempt emissions units, shall not exceed 24.9 TPY on a rolling, 12-month summation basis.

The permittee has existing records to demonstrate compliance with this emission limitation upon permit issuance.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.b:
 - a. The name and identification number of each coating employed;
 - b. The individual 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;

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- 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 this emissions unit:
 - 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 VOC content of each coating and cleanup material, in pounds of VOC per

Emissions Unit ID: R006

gallon of coating or cleanup material;

- d. The total VOC emission rate for all coatings and cleanup materials, in pounds of VOC 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 VOC 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 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 total volatile organic compound (VOC) content in pounds per gallon in each coating, as applied;
 - c. The number of gallons of each coating employed;
 - d. The name and identification number of each cleanup material employed;
 - e. The total volatile organic compound (VOC) content in pounds per gallon in each cleanup material, as applied;
 - f. The number of gallons of each cleanup material employed;
 - g. The total VOC emissions from all coatings and cleanup materials employed, in pounds or tons [the sum of (b) times (c) for all coatings plus the sum of (e) times (f) for all cleanup materials, and divided by 2,000 pounds per ton if the units are in tons];
 - h. The updated rolling, 12-month summation of the total VOC emissions, in tons. This shall include the information for the current month and the preceding eleven calendar months.
- 4. The permit to install for emissions units R005 and R006 was evaluated based on the

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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: 1-Methoxy-2-propanol

TLV ($\mu\text{g}/\text{m}^3$): 368,589

Maximum Allowable Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 5311

MAGLC ($\mu\text{g}/\text{m}^3$): 8776

Physical changes to or in the method of operation of the emissions unit after its 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

Emissions Unit ID: **R006**

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 its 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 VOC emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly VOC emissions for each such day; and
 - b. An identification of each day during which the VOC emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual VOC emissions for each such day.

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.

Issued: To be entered upon final issuance

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.b. 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 notify the Hamilton County Department of Environmental Services of any exceedance of the VOC emission limitation 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.)

E. Testing Requirements

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

Emission Limitations:

8 lbs/hr and 40 lbs/day of VOC emissions from coatings and cleanup materials in this emissions unit.

Applicable Compliance Method:

Compliance with the VOC emission limitations shall be determined by the record keeping requirements specified in term and condition C.2.

2. Formulation data or U.S. EPA method 24 (for coatings) shall be used to determine the VOC 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.b shall be determined by the required record keeping in term and condition C.1.
4. Compliance with the VOC emission limitations specified in term and condition A.2.c shall be determined by the required record keeping in term and condition C.3.

F. Miscellaneous Requirements

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

Wine Cellar Innovations

DTI Application: 14-05872

Facility ID: 1431071007

Emissions Unit ID: R006

C.3, D and E.