



3/2/2015

Rick Wooldridge
Wayne-Dalton Corp, a division of Overhead Door Corp
1 Door Drive
P.O. Box 67
Mt. Hope, OH 44660

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0238000008
Permit Number: P0118507
Permit Type: Initial Installation
County: Holmes

Certified Mail

Table with 2 columns: Yes/No and various permit categories like TOXIC REVIEW, SYNTHETIC MINOR TO AVOID MAJOR NSR, etc.

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued...

Andrew Hall and Ohio EPA DAPC, Northeast District Office
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled.

Sincerely,

Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NEDO





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Wayne-Dalton Corp, a Division of Overhead Door Corp (Wayne-Dalton) is a manufacturer of door component. The facility currently is a non-Title V facility and has two coating operations (R003 and R004). In this FEPTIO, the facility proposed to install and operate a new coating operation, R005, with federally enforceable limitations to avoid being a major source.

3. Facility Emissions and Attainment Status:

The facility is located at Mt Hope, Holmes County, an area designated as "attainment" for all criteria pollutants, such as ozone, sulfur dioxide, PM<sub>2.5</sub>, carbon monoxide and lead. Wayne-Dalton is a minor source for PM<sub>2.5</sub>, and will not be a "Major Source" for VOC, each single hazardous air pollutant (HAP) and combined total HAPs emissions, based upon rolling, 12-month federally enforceable facility-wide restrictions contained in this permit. Therefore, the requirements of Title V and MACT under 40 Code of Federal Regulation (CFR) Part 63, subpart M, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products, and subpart P, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products will not be applicable.

4. Source Emissions:

The facility currently operates under PTIO P0108644, issued final on September 19, 2011, for emissions unit R003, and PTIO P0115624, issued final on October 29, 2013, for emissions unit R004. This FEPTIO proposed to federally enforceable restrict VOC emissions not to exceed 80.0 tons per rolling, 12-month period, each single HAP emissions not to exceed 9.90 tons per rolling, 12-month period, and combined total HAPs not to exceed 24.90 tons per rolling, 12-month period to avoid being a major source of Title V and MACT. Wayne-Dalton is also required by this permit to track emissions, keep records, and submit reports.

5. Conclusion:

The emission limitations contained in this FEPTIO are adequate to provide federally enforceable limitations to ensure that the applicable Title V thresholds will not be exceeded.

6. Please provide additional notes or comments as necessary:

None



7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC <sub>facility-wide</sub>	80.0
Each single HAP	9.90
Combined total HAPs	24.90

PUBLIC NOTICE  
3/2/2015 Issuance of Draft Air Pollution Permit-To-Install and Operate

Wayne-Dalton Corp, a division of Overhead Door Corp

PO BOX 67,

MOUNT HOPE, OH 44660

Holmes County

FACILITY DESC.: All Other Miscellaneous Wood Product Manufacturing

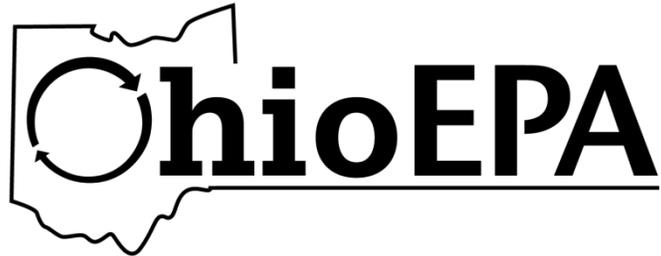
PERMIT #: P0118507

PERMIT TYPE: Initial Installation

PERMIT DESC: Federally enforceable permit for installation and operation emissions unit R005, a coating line for wood, fiberglass, plastic, and metal door panels, which includes makor spray system (reciprocating spray machine) with overspray filters.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Tracy Gu, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)963-1200





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for**

Wayne-Dalton Corp, a division of Overhead Door Corp

Facility ID:	0238000008
Permit Number:	P0118507
Permit Type:	Initial Installation
Issued:	3/2/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control  
Permit-to-Install and Operate**

for  
Wayne-Dalton Corp, a division of Overhead Door Corp

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit? .....	4
3. What records must I keep under this permit? .....	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	4
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	5
7. What reports must I submit under this permit? .....	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? .....	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	7
15. What happens if a portion of this permit is determined to be invalid? .....	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions .....	14
1. R005, Makor Spray System .....	15





**Draft Permit-to-Install and Operate**  
Wayne-Dalton Corp, a division of Overhead Door Corp  
**Permit Number:** P0118507  
**Facility ID:** 0238000008  
**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0238000008  
Application Number(s): A0052668  
Permit Number: P0118507  
Permit Description: Federally enforceable permit for installation and operation emissions unit R005, a coating line for wood, fiberglass, plastic, and metal door panels, which includes makor spray system (reciprocating spray machine) with overspray filters.  
Permit Type: Initial Installation  
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 3/2/2015  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Wayne-Dalton Corp, a division of Overhead Door Corp  
PO BOX 67  
MOUNT HOPE, OH 44660

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087  
(330)963-1200

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



**Draft Permit-to-Install and Operate**  
Wayne-Dalton Corp, a division of Overhead Door Corp  
**Permit Number:** P0118507  
**Facility ID:** 0238000008  
**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number: P0118507

Permit Description: Federally enforceable permit for installation and operation emissions unit R005, a coating line for wood, fiberglass, plastic, and metal door panels, which includes makor spray system (reciprocating spray machine) with overspray filters.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>R005</b>
Company Equipment ID:	Makor Spray System
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install and Operate**  
Wayne-Dalton Corp, a division of Overhead Door Corp  
**Permit Number:** P0118507  
**Facility ID:** 0238000008  
**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Draft Permit-to-Install and Operate**  
Wayne-Dalton Corp, a division of Overhead Door Corp  
**Permit Number:** P0118507  
**Facility ID:** 0238000008  
**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) B.3.a)(1), B.3.b)(1), B.4.a), B.5.a), B.5.b), B.6.a) and B.7.a)
2. Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
3. Applicable Emissions Limitations and/or Control Requirements
  - a) The specific operation(s), property, and/or equipment that constitute the facility along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Facility-wide emissions shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
(1)	OAC rule 3745-31-05(D) (Synthetic Minor to Avoid Title V)	See B.3.b)(1) and B.4.a).
(2)	OAC rule 3745-21-15	See B.3.b)(2).

- b) Additional Terms and Conditions
  - (1) The facility-wide emissions shall not exceed the following:
    - a. 80.0 tons volatile organic compound (VOC) per rolling, 12-month period;
    - b. 9.90 tons per rolling, 12-month period of any individual hazardous air pollutant (HAP); and
    - c. 24.90 tons per rolling, 12-month period of total combined HAPs.
  - (2) The facility operates under Standard Industrial Code (SIC) of 2499, which is not wood furniture manufacturing operations as defined in OAC rule 3745-21-01(X). In accordance with OAC rule 3745-21-15(A)(1), OAC rule 3745-21-15 is not applicable.



4. Operational Restrictions

- a) To ensure enforceability with the facility-wide emission restrictions during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the facility-wide emission levels specified in the following table:

Month	Maximum Allowable VOC Emissions (tons)	Maximum Allowable Individual HAP Emissions (tons)	Maximum Allowable Total Combined HAPs Emissions (tons)
1	7.0	0.90	2.10
1 – 2	14.0	1.80	4.20
1 – 3	21.0	2.70	6.30
1 – 4	28.0	3.60	8.40
1 – 5	35.0	4.50	10.60
1 – 6	42.0	5.40	12.80
1 – 7	49.0	6.30	14.90
1 – 8	56.0	7.20	17.00
1 – 9	63.0	8.00	19.10
1 – 10	70.0	8.80	21.20
1 - 11	77.0	9.60	23.30
1 - 12	80.0	9.90	24.90

After the first 12 calendar months of operation following issuance of this permit, compliance with the emission restrictions for emissions of VOC, individual HAP and total combined HAPs shall be based upon a rolling, 12-month summation of VOC, individual HAP and total combined HAPs emissions collected and recorded as in section B.5.a).

5. Monitoring and/or Recordkeeping Requirements

- a) The permittee shall collect and record the following facility-wide information each month:
- (1) the company identification of each coating and cleanup material employed;
  - (2) the volumes of each coating and cleanup material employed minus the volumes of each coating and cleanup material recovered for disposal, defined as “U”, in gallons per month;



- (3) the VOC content for each coating and cleanup material, defined as “VOC”, in pounds per gallon;
- (4) the total VOC emissions from all coatings and cleanup materials employed, in pounds per month, and shall be calculated by the following equation:

$$E_{voc} = \sum_{i=0}^n (VOC \times U)_i$$

where:

$E_{VOC}$  = the total VOC emissions from all coatings and cleanup materials employed, in pounds per month;

$i$  = subscript denoting a coating or cleanup material employed; and

$n$  = the total number of coatings and cleanup materials employed;

- (5) the rolling, 12-month period VOC emissions from all coatings and cleanup materials employed in the facility, defined  $E_{VOC12}$ , in tons, and shall be the rolling, 12-month period total for  $E_{VOC}$ ;
- (6) individual HAP content for each coating or cleanup material, defined as  $HAP_c$ , in pounds per gallon;

<sup>1</sup> A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials.

- (7) the facility-wide emissions of individual HAP, defined as  $E_{HAP}$ , in pounds per month, and shall be calculated by the following equation:

$$E_{HAP} = \sum_{j=0}^m (HAP_c \times U)_j$$

where:

$E_{HAP}$  = the total emissions of individual HAP from all coatings and cleanup materials employed facility-wide, in pounds per month;

$j$  = subscript denoting a coating or cleanup material employed facility-wide; and

$m$  = the total number of coatings and cleanup materials employed facility-wide;

- (8) the rolling, 12-month period emissions of individual HAP from all coatings and cleanup materials employed in the facility, in tons, and shall be calculated as the sum of  $E_{HAP}$  for the rolling, 12-month period; and



- (9) the rolling, 12-month period emissions of total combined HAPs from all coatings and cleanup materials employed in the facility, in tons, and shall be calculated as the sum of the rolling, 12-month period emissions of individual HAP facility-wide, as determined in B.5.a)(8).

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

- b) The permittee shall collect and record the following facility-wide information each month:
  - (1) the rolling, 12-month period VOC emissions facility-wide, in tons;
  - (2) the rolling, 12-month period individual HAP emissions facility-wide, in tons; and
  - (3) the rolling, 12-month period total combined HAPs emissions facility-wide, in tons.

## 6. Reporting Requirements

- a) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - (1) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - a. The facility-wide emissions shall not exceed the following:
      - i. 80.0 tons of VOC per rolling, 12-month period;
      - ii. 9.90 tons per rolling, 12-month period of any individual HAP; and
      - iii. 24.90 tons per rolling, 12-month period of total combined HAPs.
  - (2) the probable cause of each deviation (excursion);
  - (3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - (4) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).



7. Testing Requirements

- a) Compliance with the Emissions Limitations and/or Control Requirements specified in sections B.2.a) and B.2.b) of these terms and conditions shall be determined in accordance with the following methods:

(1) Emission Limitations:

The facility-wide VOC emissions shall not exceed 80.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated through the monitoring and record keeping requirements specified in B.5.b)(1).

(2) Emission Limitations:

The facility-wide individual HAP emissions shall not exceed 9.90 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated through the monitoring and record keeping requirements specified in B.5.b)(2).

(3) Emission Limitations:

The facility-wide total combined HAPs emissions shall not exceed 24.90 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated through the monitoring and record keeping requirements specified in B.5.b)(3).



**Draft Permit-to-Install and Operate**  
Wayne-Dalton Corp, a division of Overhead Door Corp  
**Permit Number:** P0118507  
**Facility ID:** 0238000008  
**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. R005, Makor Spray System**

**Operations, Property and/or Equipment Description:**

A coating operation line for coating metal, fiberglass, plastic, and wood garage door panel, consistent with Flame Treat System (parts prep), Makor Spray System (reciprocating spray machine with overspray filters, and a drying oven (< 200<sup>o</sup>F).

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)b, d)(6), d)(7), d)(8), d)(9) and e)(1)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)e

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(C)	See c)(1), c)(2), d)(1), d)(2), d)(3), d)(4) and d)(5).
b.	ORC 3704.03(F)(4)(c) and OAC rule 3745-114-01	See d)(6), d)(7), d)(8), d)(9) and e)(1).
c.	OAC rule 3745-31-05(A)(3)	<p>The volatile organic compound (VOC) emission limitations established pursuant to this rule are equivalent to the emission limitations established pursuant to OAC rule 3745-31-05(D).</p> <p>The particulate emission (PE) limitation established pursuant to this rule is equivalent to the requirements established pursuant to OAC rule 3745-17-11(C).</p> <p>See b)(2)a.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05 (A)(3) do not apply to particulate emissions from this air contaminant source since the potential to emit is less than 10 tons per year.  See b)(2)b.
e.	OAC rule 3745-31-05(D)	See B.3.a)(1).
<b>Coating Operations for Miscellaneous Metal Parts and Products</b>		
f.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)c.
<b>Coating Operations for Wood, Fiber Glass, or Plastic Door Parts and Products</b>		
g.	OAC rule 3745-21-07(M)(2)	See b)(2)d.
h.	OAC rule 3745-21-15	See B.3.a)(2).

(2) Additional Terms and Conditions

- a. This BAT emission limit for particulate emissions applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05 (A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. The requirements apply once U.S. EPA approves OAC paragraph 3745-31-05 (A)(3)(a)(ii) (the less 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The VOC content for coating miscellaneous metal parts or products shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents, for any coating that is dried at temperatures not exceeding two hundred (200) degrees Fahrenheit.
- d. In accordance with OAC rule 3745-21-07(M)(3)(a)(ii), OAC rule 3745-21-07(M)(2) is not applicable because this emissions unit has not commenced installation prior to the effective date of the rule.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) The federally enforceable permit-to-install and operate (FEPTIO) application for this emissions unit R005 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted using



an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists’ (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists’ (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

The following summarizes the results of dispersion modeling for the significant toxic contaminants or “worst case” toxic contaminant(s):

Compound: Methanol

TLV (mg/m3): 262.08589

Maximum Hourly Emission Rate (lbs/hr): 1.30

Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 173.6

MAGLC (ug/m3): 6,240

The permittee, having demonstrated that emissions of methanol, from emissions unit R005, is calculated to be less than eighty per cent of the maximum



acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (7) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour "maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (8) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);



- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (9) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (10) The permit shall collect and record the following information each month for this emissions unit and maintain the information at the facility for a period of three years, in accordance with OAC rule 3745-21-09(B)(3)f):
- a. the name and company identification number of each coating, as applied;
  - b. the type of door (wood, fiberglass, plastic, or metal) that each coating applied to; and
  - c. the mass of VOC content per volume of each coating (excluding water and exempt solvents) as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for  $C_{VOC,2}$ , in pounds VOC/gallon of coating.

This information does not have to be kept on a line-by-line basis. Also, if the owner or operator mixes complying coatings at a coating line, it is not necessary to record the VOC content of the resulting mixture.

e) Reporting Requirements

- (1) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- (2) The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of each monthly record showing the application of a coating with greater than 3.5 pounds VOC per gallon, excluding water and exempt solvents. The notification shall include a copy of each such record and it shall be sent to the Ohio EPA Northeast District Office within 30 days following the end of the calendar month during which the noncompliant coating was applied.



- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:

The VOC content for coating miscellaneous metal parts or products shall not exceed 3.5 pounds per gallon of coating, excluding water and exempt solvents, for any coating that is dried at temperatures not exceeding two hundred (200) degrees Fahrenheit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(10)c.
- g) Miscellaneous Requirements
- (1) None.