



4/30/2015

Mr. Mike Yoder
ProVia Walnut Creek Facility
2150 State Route 39
Sugarcreek, OH 44681

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

Facility ID: 0238000159
Permit Number: P0118498
Permit Type: Initial Installation
County: Holmes

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

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 for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Holmes County Hub. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northeast District Office
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. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200.

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

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install and Operate Initial Installation
ProVia Walnut Creek Facility

2150 State Route 39,, Sugarcreek, OH 22740

ID#: P0118498

Date of Action: 4/30/2015

Permit Desc: Installation of R013 Automatic spray coating of fiberglass, metal and plastic doors, windows and trim with a 0.75 mmBtu/hr natural gas-fired drying oven..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the ID # or: Christine McPhee, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)963-1200



Permit Strategy Write-Up

1. Check all that apply: X Synthetic Minor Determination Netting Determination
2. Source Description: Installation of (R013) Q-One Flatline: Automatic spray coating of fiberglass, metal and plastic doors and windows with a 0.75 mmBtu/hr. natural gas-fired drying oven.
3. Facility Emissions and Attainment Status: The facility is classified as a synthetic minor facility and has restrictions at R003-R009, R011 & R012 to limit potential volatile organic compound (VOC) emissions. The SIC code is 3442 metal doors, sash, and trim and the NAICS is 332321 metal window and door manufacturing. Wooden door & window parts and plastic parts are processed at any of several wood and/or plastic working machines (P002 – P004). After partial assembly polyurethane foam is injected in between the door skins at (P001 or P005) slabstock manufacturing with rigid polyurethane insulation. Door and window parts are spray coated at R003 – R009, R011 & R012 and soon at R013. Current potential emissions are 99.45 tons VOC/yr., 11.93 ton PM₁₀/yr. and at least 0.84 ton HAP_{COMBINED}/yr.

The facility is located in Sugarcreek (Township), in Holmes County, which is in attainment with the criteria pollutant standards, except it has an undesignated status with the 1-hour NO_x standard and the 1-hour SO₂ standard.

4. Source Emissions: With restrictions potential emissions would be 21.44 ton VOC/yr. from coating usage. The R013 installation project emissions are: 26.34 tons/yr. OC, 21.457 ton VOC/yr., 0.302 ton PE-PM₁₀/yr., 0.002 ton SO₂/yr., 0.313 ton NO_x/yr., 0.26 ton CO/yr., 1.56 x 10⁻⁶ ton Lead/yr. and 0 ton HAP/yr. (excluding small amounts from natural gas combustion).

OAC rule 3745-17-07(A) – 20% opacity, as a 6-min. ave. from the drying oven stack.

OAC rule 3745-17-10(B) – 0.020 lb. PE/mmBtu of actual heat input from the drying oven.

OAC rule 3745-17-11(C) - The use of a device to control particulate emissions (PE) from the coating operation so that the controlled PE is the potential rate. All PE are assumed to be PM₁₀ emissions. This rule is in the Ohio State Implementation Plan (SIP).

OAC rule 3745-21-09(U)(1)(d) – 3.5 lbs. VOC/gal. of coating limit, as a daily volume-weighted average, excluding water and exempt solvents, for coating metal parts or products, for any coating that is dried at temperatures not exceeding two hundred (200) degrees Fahrenheit.

OAC rule 3745-31-05(A)(3) - Ohio Best Available Technology requirements include the following:

- 3.5 lbs. VOC/gal. of coating limit, as a daily volume-weighted average, excluding water and exempt solvents, for coating non-metal parts or products (e.g. fiberglass and plastic);
- OAC rule 3745-17-11(C) compliance; and
- Operating restriction, term C.1.c)(1) - The permittee shall burn only natural gas in the drying oven associated with this emissions unit.

OAC rule 3745-31-05(A)(3)(a)(ii) – Exemption from Ohio BAT requirements for SO₂, CO and NO_x since potential emissions of each pollutant is less than 10 tons/yr., whenever U.S. EPA approves the rule.



OAC rule 3745-31-05(D) - Without restrictions maximum, uncontrolled emissions could be 258 ton VOC/yr. from the coating operation. The applicant has requested a 12,250 gal._{COATING}/rolling 12-months restriction for R013 to limit potential VOC emissions.

$$12,250 \text{ gal.}_{\text{COATING}}/\text{rolling 12-months} \times 3.5 \text{ lbs. VOC}/\text{gal.}_{\text{CTG}} \times \text{ton VOC}/2000 \text{ lbs. VOC} \\ = 21.44 \text{ tons VOC}/\text{rolling 12-months from coatings at R013.}$$

With 0.017 ton VOC/yr. from natural gas combustion emissions the total from R013 would be 21.46 tons VOC/yr. Per OAC rule 3745-31-05(D) the VOC emissions from coating and cleanup operations will be limited to 21.44 tons per rolling, 12-months via the restriction of 12,250 gal._{COATING}/rolling 12-months. The installation of R013 will make the facility a major VOC source that will be subject to Title V operating permit requirements but not subject to the Prevention of Significant Deterioration (PSD) rule requirements.

5. Conclusion: The project is a minor VOC addition to a synthetic minor facility and will not be subject to the PSD requirements.
6. Please provide additional notes or comments as necessary: Rush processing was requested by the applicant on 2/24/2015.
7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PE-PM ₁₀	0.302
VOC	21.46
OC	26.34
SO ₂	0.002
CO	0.26
NO _x	0.313



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
ProVia Walnut Creek Facility**

Facility ID:	0238000159
Permit Number:	P0118498
Permit Type:	Initial Installation
Issued:	4/30/2015
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
ProVia Walnut Creek Facility

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	10
1. R013, Q-One Flatline Spray Booth.....	11



Draft Permit-to-Install and Operate

ProVia Walnut Creek Facility

Permit Number: P0118498

Facility ID: 0238000159

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0238000159
Application Number(s): A0052696
Permit Number: P0118498
Permit Description: Installation of R013 Automatic spray coating of fiberglass, metal and plastic doors, windows and trim with a 0.75 mmBtu/hr natural gas-fired drying oven.
Permit Type: Initial Installation
Permit Fee: \$200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 4/30/2015
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:

ProVia Walnut Creek Facility
2150 State Route 39
Sugar creek, OH 22740

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

ProVia Walnut Creek Facility

Permit Number: P0118498

Facility ID: 0238000159

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0118498

Permit Description: Installation of R013 Automatic spray coating of fiberglass, metal and plastic doors, windows and trim with a 0.75 mmBtu/hr natural gas-fired drying oven.

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

Emissions Unit ID:	R013
Company Equipment ID:	Q-One Flatline Spray Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate

ProVia Walnut Creek Facility

Permit Number: P0118498

Facility ID: 0238000159

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

ProVia Walnut Creek Facility

Permit Number: P0118498

Facility ID: 0238000159

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install and Operate

ProVia Walnut Creek Facility

Permit Number: P0118498

Facility ID: 0238000159

Effective Date: To be entered upon final issuance

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) None.
2. The Ohio EPA has determined that this facility may be subject to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. On January 9, 2008, U.S. EPA promulgated the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, 40 CFR Part 63, Subpart HHHHHH. Spray applications using coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) and paint stripping operations using methylene chloride must be operated in compliance with this federal rule.

Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



Draft Permit-to-Install and Operate

ProVia Walnut Creek Facility

Permit Number: P0118498

Facility ID: 0238000159

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. R013, Q-One Flatline Spray Booth

Operations, Property and/or Equipment Description:

Automatic spray coating of fiberglass, metal and plastic doors, windows and trim with a 0.75 mmBtu/hr natural gas-fired drying oven.

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)h and d)(9)

(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)g

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 3745-17-07(A)	Visible particulate emissions from the drying oven stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. See c)(1).
b.	OAC rule 3745-17-10(B)	The particulate emissions (PE) from the natural gas fired dryer shall not exceed 0.020 pound per million Btu of actual heat input. See c)(1).
c.	OAC rule 3745-17-11(C)	See c)(2), c)(3), d)(2), d)(3), d)(4), d)(5) and d)(6).
d.	OAC rule 3745-21-09(U)(1)(d)	See b)(2)a.
e.	OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) content for coating non-metal parts or products (e.g. fiberglass and plastic) shall not exceed 3.5 pounds per gallon of coating, as a daily volume-weighted average, excluding water and exempt



Draft Permit-to-Install and Operate

ProVia Walnut Creek Facility

Permit Number: P0118498

Facility ID: 0238000159

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		solvents. The PE limitation from the coating operation established pursuant to this rule is equivalent to the requirements established pursuant to OAC rule 3745-17-11(C). See b)(2)b and c)(1).
f.	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 the PE rate and the emissions of sulfur dioxide (SO ₂), carbon monoxide (CO) and nitrogen oxides (NO _x) from the natural gas fired dryer from this air contaminant source since the potential to emit is less than 10 tons per year. See b)(2)c.
g.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Prevention of Significant Deterioration Rules Applicability	See b)(2)d, b(2)e, d)(8) and e)(4).
h.	ORC 3704.03(F)(4) and OAC rule 3745-114-01	See d)(9).

(2) Additional Terms and Conditions

- a. The VOC content for coating miscellaneous metal parts or products shall not exceed 3.5 pounds per gallon of coating, as a daily volume-weighted average, excluding water and exempt solvents, for any coating that is dried at temperatures not exceeding two hundred (200) degrees Fahrenheit.
- b. The BAT requirement specified in b(1)e and c)(1) for the PE rate and the emissions of SO₂, CO and NO_x from the natural gas fired dryer applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the SIP.
- d. The emissions of VOC from the coating and cleanup operations from this emissions unit shall not exceed 21.46 tons/year, based upon a rolling, 12-month summation of the monthly emissions from the coating and cleanup operations.



To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC Emissions, Tons</u>
0 – 1	1.79
1 – 2	3.57
1 – 3	5.18
1 – 4	6.91
1 – 5	8.63
1 – 6	10.48
1 – 7	11.73
1 – 8	13.81
1 - 9	15.54
1 - 10	17.27
1 - 11	18.99
1 - 12	21.44

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the monthly emissions.

- e. The maximum annual coating usage for this emissions unit shall not exceed 12,250 gallons based upon a rolling, 12-month summation of the coating usage figures. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage, Gallons</u>
0 – 1	1,021
1 – 2	2,042
1 – 3	3,062
1 – 4	4,086
1 – 5	5,104
1 – 6	6,125
1 – 7	7,145
1 – 8	8,167
1 - 9	9,188
1 - 10	10,208
1 - 11	11,229
1 - 12	12,250

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage figures.



c) Operational Restrictions

- (1) The permittee shall burn only natural gas in the drying oven associated with this emissions unit.
- (2) 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.
- (3) 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) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) 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 Ohio EPA Northeast District Office upon request.
- (3) 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.
- (4) 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.
- (5) 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 Ohio EPA Northeast District Office upon request.

- (6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was 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.
- (7) The permittee shall collect and record the following information each day for the coating line:
 - a. the name and identification number of each coating and each cleanup material, as applied;
 - b. the organic compound (OC) content of each cleanup material employed, in pounds per gallon, excluding water;
 - c. an identification of whether the cleanup material contains any VOC components;
 - d. the type of substrate (metal or non-metal) that each coating is applied to;
 - e. the mass of VOC per volume of each coating and each cleanup material, excluding water and exempt solvents, as applied;
 - f. the net volume of each coating and each cleanup material, excluding water and exempt solvents, as applied;
 - g. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for $C_{VOC,2}$ for metal substrates; and
 - h. the daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in OAC rule 3745-21-10(B)(9) for $C_{VOC,2}$ for non-metal substrates.
- (8) The permittee shall maintain monthly records of the following information for each emissions unit:
 - a. the VOC emission rate from all coatings and cleanup materials employed for each month of operations, in tons;
 - b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions. (Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC emissions for each calendar month.);



- c. the OC emission rate from all coatings and cleanup materials employed for each month of operations, in tons;
- d. the coating usage for each month, in gallons; and
- e. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the coating usage figures. (Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.)

These monthly records shall also be maintained for the purpose of determining the annual emissions for the emissions unit.

- (9) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (2) The permittee shall submit deviation (excursion) reports that identify each day when a daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation specified in b)(2)a whenever metal parts and products are coated. Each report shall be submitted within 45 days after the exceedance occurs.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Northeast District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.



- (4) The permittee shall submit quarterly deviation (excursion) reports that identify for this emissions unit:
- a. 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:
 - i. all exceedances of the rolling, 12-month emission limitation for VOC and, for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels; and
 - ii. all exceedances of the rolling, 12-month limitation on coating usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. 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, electronically through Ohio EPA Air Services, 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 Northeast District Office).

- (5) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA Northeast District Office 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. The permittee shall identify the following information that have been detected by the monitoring, record keeping and/or testing requirements in this permit:
- a. an identification of each day when a daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit was in operation;
 - b. an identification of each day when a daily record showing that the daily volume-weighted average VOC content exceeds the applicable limitation specified in b)(1)e whenever non-metal parts and products are coated;



- c. the probable cause of each deviation (excursion);
- d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- e. the magnitude and duration of each deviation (excursion).

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

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:

Visible PE from the drying oven stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

The PE from the natural gas fired dryer shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

Compliance may be based on the following estimation method:

$$PE(\text{lb./mmBtu}) = EF/(\text{Btu}/\text{cf})$$

where:

PE(lb/mmBtu) = the PE rate, which is estimated to be 0.0072 pound of PE-PM₁₀ per million Btu actual heat input;

EF = emissions factor, which is 7.6 lb. PE-PE₁₀ per million cubic foot of natural gas fuel flow per AP42 Table 1.4-2. Chap. 1.4 (July, 1998); and

Btu/cf = factor to convert heat input to cubic foot of natural gas fuel flow, which is 1050 Btu/cf as specified in the application for FEPTIO P0118498.



c. Emission Limitations:

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

The VOC content for coating non-metal parts or products (e.g. fiberglass and plastic) shall not exceed 3.5 pounds per gallon of coating, as a daily volume-weighted average, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be based on the following estimation method(s):

$$(C_{VOC,2})_A = \frac{\sum_{i=1}^n [(C_{VOC,2i} L_{Ci}) (V_{Si} + V_{VOCi})]}{\sum_{i=1}^n L_{Ci} (V_{Si} + V_{VOCi})}$$

where:

$(C_{VOC,2})_A$ = the daily volume-weighted average VOC content of all coatings, as applied, as specified in OAC rule 3745-21-10(B)(9).

$C_{VOC,2}$ = the VOC content in pounds of VOC per gallon of coating, excluding water and exempt solvents calculated as follows:

$$C_{VOC,2} = (D_C)(W_{VOC}) / (V_S + V_{VOC}).$$

D_C = the density of a coating, in pounds of coating per gallon of coating.

W_{VOC} = the weight fraction of VOC in a coating = $W_{VM} - W_W - W_{ES}$.

W_{VM} = the weight fraction of volatile matter in coating, in pound of volatile matter per pound of coating.

W_W = the weight fraction of water in coating, in pound of water per pound of coating.

W_{ES} = the weight fraction of exempt solvent in coating, in pound of exempt solvent per pound of coating.

V_S = the volume fraction of solids in coating, in gallons of solids per gallon of coating.

V_{VOC} = the volume fraction of VOC in a coating. = $V_{VM} - V_W - V_{ES}$.

V_{VM} = the volume fraction of volatile matter in coating, in gallon of volatile matter per gallon of coating.

V_W = the volume fraction of water in coating, in gallon of water per gallon of coating.



V_{ES} = the volume fraction of exempt solvent in coating, in gallon of exempt solvent per gallon of coating.

A = a subscript denoting that the indicated VOC content is a weighted average of the coatings employed during time period t.

L_C = the liquid volume of coating employed during time period t, in gallons of coating.

M_C = the mass of coating employed during the time period t, in pounds of coating.

i = a subscript denoting a specific coating employed during time period t.

n = the total number of coatings employed during time period t.

t = the time period specified for the weighted average VOC content is per day and not included in the calculation.

For an alternative compliance method request, the permittee shall submit a written request and receive approval from Ohio EPA before an alternative method, not listed above, may be used for the VOC content determination.

d. Emission Limitation:

The emissions of VOC from the coating and cleanup operations from this emissions unit shall not exceed 21.46 tons/year, based upon a rolling, 12-month summation of the monthly emissions from the coating and cleanup operations.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in d)(8) for this emissions unit.

e. Emission Limitation:

The maximum annual coating usage for this emissions unit shall not exceed 12,250 gallons based upon a rolling, 12-month summation of the coating usage figures.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in d)(8)d for this emissions unit.



g) Miscellaneous Requirements

- (1) In accordance with OAC rule 3745-21-07(M)(3)(a), OAC rule 3745-21-07(M)(2) is not applicable because this emissions unit is not equipped with control equipment for VOC emissions.
- (2) Potential VOC emissions are generated from the coating operation and the natural gas-fired drying oven, combined, and were estimated to be 21.46 tons VOC/year.
- (3) This emissions unit will not coat wood furniture and therefore it is not subject to the requirements of OAC rule 3745-21-15 nor to the requirements of 40 CFR Part 63, Subpart JJ - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Wood Furniture Manufacturing Operations (40 CFR 63.800-63.808 and associated tables).
- (4) This emissions unit at this facility is located in Holmes County and not in any county identified in OAC rule 3745-21-24(A)(1) and is therefore not subject to the requirements of OAC rule 3745-21-24 for coating of flat wood paneling.
- (5) The Provia Walnut Creek Facility is an area (minor) source of hazardous air pollutant (HAP) emissions. This source is not subject to the NESHAP for the Surface Coating of Wood Building Products (40 CFR 63.4680 – 63.4781 and associated tables).