



State of Ohio Environmental Protection Agency

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

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 14-04888**

**DATE: 3/22/00**

A Touch of Finish  
Elwood Arnett  
131 Barron  
Woodlawn, OH 45215

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: USEPA

HCDES



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

Issue Date: 3/22/00

**FINAL PERMIT TO INSTALL 14-04888**

Application Number: 14-04888  
APS Premise Number: 1431484057  
Permit Fee: **\$800**  
Name of Facility: A Touch of Finish  
Person to Contact: Elwood Arnett  
Address: 131 Barron  
Woodlawn, OH 45215

Location of proposed air contaminant source(s) [emissions unit(s)]:

**131 Barron  
Woodlawn, Ohio**

Description of proposed emissions unit(s):

**Wood parts spray paint booth and wood stripping operation.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

#### **2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

#### **3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

#### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**9. Construction of New Sources(s)**

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

Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

**10. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

**11. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**12. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

**14. Construction Compliance Certification**

**A Touch of Finish**  
**PTI Application: 14-04888**  
**Issued: 3/22/00**

**Facility ID: 1431484057**

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**15. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

**B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	13.38

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Wood parts paint spray booth	OAC rule 3745-31-05(A)(3)	117.94 lbs/day OC, for coatings only 8.31 TPY OC, including cleanup
		See Sections A.2.2.b., A.2.2.c. and B.1.
	OAC rule 3745-21-07(G)	
		See Section B.2.
	OAC rule 3745-15-07	
		See Part I, Term A.7.

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage and emission limitations, OC content limitations and compliance with the Air Toxics Policy.
- 2.b The organic compound (OC) content of each coating employed in this emissions unit shall not exceed 6.3 lbs/gallon, as applied.
- 2.c The organic compound (OC) content of each cleanup material employed in this emissions unit shall not exceed 6.6 lbs/gallon.
- 2.d The daily emission limitation outlined above is based upon the emissions unit’s potential to emit (the maximum hourly emission rate multiplied by 24 hours/day). Therefore, no daily records are required to demonstrate compliance with this limit.

**B. Operational Restrictions**

1. The maximum annual coating and cleanup material usage for this emissions unit shall not exceed 1,485 gallons for coatings and 1,100 gallons for cleanup materials.
2. The use of photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) is prohibited.

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

1. The permittee shall collect and record the following information each month:
  - a. The company identification of each liquid organic material employed in this emissions unit; and
  - b. A record of each liquid organic material employed in this emission unit, indicating whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month for this emissions unit:
  - a. The name and identification number of each coating employed.
  - b. The OC content of each coating, in pounds per gallon, as applied.
  - c. The name and identification number of each cleanup material employed.
  - d. The OC content of each cleanup material, in pounds per gallon.
  - e. The number of gallons of each coating employed.
  - f. The number of gallons of each cleanup material employed.
  - g. The total OC emissions from all coatings and cleanup materials employed, in pounds or tons  $[(b \times e) + (d \times f)]$ .
3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

- b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

#### **D. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings and/or cleanup materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall submit annual reports which identify any exceedances of the annual coating or cleanup material usage limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
4. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
117.94 lbs/day OC, for coatings only

Applicable Compliance Method:  
Compliance has been demonstrated by multiplying the maximum hourly coating usage rate of 0.78 gal/hr by the maximum operating schedule of 24 hours/day and by the maximum OC content of 6.3 lbs/gallon.

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**PTI Application: 14 01000**  
**Issued**

**Facility ID: 1431484057**

**Emissions Unit ID: K001**

- b. Emission Limitation:  
8.31 TPY OC, including cleanup

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in Section C.2., and shall be the sum of the monthly OC emission rates for the calendar year.

- c. Emission Limitation:  
6.3 pounds OC per gallon of coating and 6.6 pounds OC per gallon of cleanup material

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the inks and coatings.

d. Usage Limitation:

1,485 gallons/year coatings and 1,100 gallons/year cleanup materials

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in Section C.2.

## **F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of OAC rule 3745-31-05(A)(3) and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 1.39

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1296

MAGLC (ug/m3): 4,476

Pollutant: Butyl Acetate

TLV (ug/m3): 712,600

Maximum Hourly Emission Rate (lbs/hr): 8.41

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7634

MAGLC (ug/m3): 16,968

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is

hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Wood stripping operation	OAC rule 3745-31-05(A)(3)	27.78 lbs/day OC 5.07 TPY OC  See Sections A.2.2.b. and B.1.
	OAC rule 3745-21-07(G)	See Section B.2.
	OAC rule 3745-15-07	See Part I, Term A.7.

**2. Additional Terms and Conditions**

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage and emission limitations, OC content limitations and compliance with the Air Toxics Policy.
- 2.b The organic compound (OC) content of each stripping material employed in this emissions unit shall not exceed 9.26 lbs/gallon.
- 2.c The daily emission limitation outlined above is based upon the emissions unit’s potential to emit. Therefore, no daily records are required to demonstrate compliance with this limit.

**B. Operational Restrictions**

1. The maximum annual stripping material usage for this emissions unit shall not exceed 1,095 gallons.
2. The use of photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) is prohibited.

### **C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each month:
  - a. The company identification of each liquid organic material employed in this emissions unit; and
  - b. A record for each liquid organic material employed, indicating whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month for the emissions unit:
  - a. The name and identification number of each stripping material employed.
  - b. The OC content of each stripping material, in pounds per gallon, as applied.
  - c. The number of gallons of each stripping material employed.
  - d. The total OC emissions from all stripping materials employed, in pounds or tons (b x c).
3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
  - b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

### **D. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

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**Issued****Facility ID: 1431484057**Emissions Unit ID: **P001**

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying stripping materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
3. The permittee shall submit annual reports which identify any exceedances of the annual stripping material usage limitation, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.
4. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
27.78 lbs/day OC  
  
Applicable Compliance Method:  
Compliance has been demonstrated by multiplying the maximum daily stripping material usage rate of 3 gallons/day by the maximum OC content of 9.26 lbs/gallon.
  - b. Emission Limitation:  
5.07 TPY OC  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements as specified in Section C.2., and shall be the sum of the monthly OC emission rates for the calendar year.
  - c. Emission Limitation:  
9.26 pounds of OC per gallon of stripping material  
  
Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements specified in Section C. Formulation data or USEPA method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the OC contents of the inks and coatings.

- d. Emission Limitation:  
1,095 gallons/year stripping material

Applicable Compliance Method:  
Compliance shall be based upon the record keeping requirements as specified in Section C.2.

## **F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 13.89

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,634

MAGLC (ug/m3): 4,476

Pollutant: Methylene Chloride

TLV (ug/m3): 173,700

Maximum Hourly Emission Rate (lbs/hr): 13.89

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,634

MAGLC (ug/m3): 4,136

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the

Emissions Unit ID: **P001**

handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-04888 Facility ID: 1431484057

FACILITY NAME A Touch of Finish

FACILITY DESCRIPTION Wood parts spray paint booth and wood CITY/TWP Woodlawn

Emissions Unit ID: P001

SIC CODE 7641 SCC CODE 4-02-025-99 EMISSIONS UNIT ID K001

EMISSIONS UNIT DESCRIPTION Wood parts spray paint booth

DATE INSTALLED 1/00

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment				
PM <sub>10</sub>	Attainment				
Sulfur Dioxide	Attainment				
Organic Compounds	Non-Attainment	18.12 lbs/day	3.98	117.94 lbs/day	8.31
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead	Attainment				
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No NESHAP? No PSD? No OFFSET POLICY? No

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**BAT has been determined to be compliance with all applicable rules, usage and emission limitations, OC content limitations and compliance with the Air Toxics Policy.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Toluene, Butyl Acetate

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-04888

Facility ID: 1431484057

FACILITY NAME A Touch of Finish

FACILITY DESCRIPTION Wood parts spray paint booth and wood CITY/TWP Woodlawn

Emissions Unit ID: **P001**

SIC CODE 7641

SCC CODE 3-09-011-01

EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION Wood stripping operation

DATE INSTALLED 1/00

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment				
PM <sub>10</sub>	Attainment				
Sulfur Dioxide	Attainment				
Organic Compounds	Non-Attainment	9.26 lbs/day	1.20	27.78 lbs/day	5.07
Nitrogen Oxides	Attainment				
Carbon Monoxide	Attainment				
Lead	Attainment				
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No

NESHAP? No

PSD? No

OFFSET POLICY? No

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

**BAT has been determined to be compliance with all applicable rules, usage and emission limitations, OC content limitations and compliance with the Air Toxics Policy.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES        NO

IDENTIFY THE AIR CONTAMINANTS: Methylene chloride and toluene

20 NEW SC

PTI Num

FACILITY

Emissions Unit ID: P001

FACILITY DESCRIPTION Wood parts spray paint booth and wood stripping operation.

CITY/TWP Woodlawn

Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

Toxic Screening Analysis

Please provide any additional permit specific notes as you deem necessary:

A Touch of Finish
131 Barron Drive
Woodlawn, OH 45215

PN: 1431484057

PERMIT REVIEW NARRATIVE

PTI 14-04888

A Touch of Finish refinishes furniture and wood components. This PTI is for a wood parts paint spray booth (K001) and a wood stripping operation (P001).

The OAC rules governing emissions unit K001 are 3745-31-05(A)(3), 3745-21-07(G) and 3745-15-07. These rules will limit the OC content of the coatings to 6.3 lbs/gallon and the OC content of the cleanup materials to 6.6 lbs/gallon. Usage limitations are set at 1,485 gal/yr for coatings and 1,100 gal/yr for cleanup materials. Therefore, the emissions will be limited to 117.94 lbs/day and 8.31 TPY OC. Photochemically reactive materials are prohibited in emissions unit K001 as well. The Potential to Emit (PTE) from the paint booth is 25.15 TPY OC.

The OAC rules governing emissions units P001 are 3745-31-05(A)(3), 3745-21-07(G) and 3745-15-07. Photochemically reactive materials are also prohibited in this emissions unit. Limits are set for the stripping material at 9.26 lbs OC/gallon and 1,095 gallons per year. This limit is based on the maximum stripping material usage rate of 3 gallons/day, therefore, the PTE is the same as the limit of 5.07 TPY OC. 1718 Flo-strip (the stripping material used) is composed mostly (75%) of methylene chloride. However, this is a hand wipe operation, and there is no standing solvent in the tank, so this operation does not fall into 40 CFR Part 63 Subpart T.

Monthly record keeping will demonstrate compliance with all limitations, as will exceedance and annual reports. The PTE for both emissions units is 30.22 TPY OC, therefore this permit will be issued in final. Federally enforceable limits are not needed. Potential HAPs from this facility are 9.97 TPY, with the largest single HAPs emissions at 4.28 TPY toluene. Therefore, the potential to emit is less than the limits of 10 TPY for any single HAP and less than 25 TPY for total HAPs.

**2 NEW SOURCE REVIEW FORM B**

PTI Number: 14-04888

Facility ID: 1431484057

FACILITY NAME A Touch of Finish

FACILITY DESCRIPTION Wood parts sprav naint booth and wood CITY/TWP Woodlawn

Emissions Unit ID: **P001**

SCREEN3 modeling was required for both emissions units. Most of the air toxics emitted from these sources are less than 1 TPY, but some toxics did require modeling. Toluene, butyl acetate, acetone and N-heptane were modeled for emissions unit K001 and toluene and methylene chloride were modeled for emissions unit P001. All toxics easily passed the modeling.

BAT for emissions units K001 and P001 is compliance with the applicable rules, usage and emission limitations, OC content limitations and compliance with the Air Toxics Policy.

A direct final permit to install should be issued.

The permit fee is:

\$400.00 Process between 1 and 1,000 lbs/hr (K001) - doubled, equipment installed in 1/00

~~\$400.00~~ Process between 1 and 1,000 lbs/hr (P001) - doubled, equipment installed in 1/00

\$800 = Total

Prepared by: Kari Ball

Date prepared: February 23, 2000

### Permit To Install Synthetic Minor Write-Up

NONE

Please fill in the following for this permit:

#### TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant

Tons Per Year

OC

13.38