



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

Certified Mail

9/3/2015

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

Peter Dunn
P. Graham Dunn, Inc.
630 Henry Street
Dalton, OH 44618

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0285000461
Permit Number: P0119053
Permit Type: Renewal
County: Wayne

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-NEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
P. Graham Dunn, Inc.**

Facility ID:	0285000461
Permit Number:	P0119053
Permit Type:	Renewal
Issued:	9/3/2015
Effective:	9/3/2015
Expiration:	9/3/2020



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

for
P. Graham Dunn, Inc.

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Final Permit-to-Install and Operate
P. Graham Dunn, Inc.
Permit Number: P0119053
Facility ID: 0285000461
Effective Date: 9/3/2015

Authorization

Facility ID: 0285000461
Application Number(s): A0053648
Permit Number: P0119053
Permit Description: FEPTIO renewal permit for coating lines and woodworking operations.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 9/3/2015
Effective Date: 9/3/2015
Expiration Date: 9/3/2020
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

P. Graham Dunn, Inc.
630 Henry Street
Dalton, OH 44618

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

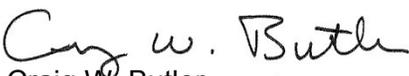
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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



Final Permit-to-Install and Operate
P. Graham Dunn, Inc.
Permit Number: P0119053
Facility ID: 0285000461
Effective Date: 9/3/2015

Authorization (continued)

Permit Number: P0119053

Permit Description: FEPTIO renewal permit for coating lines and woodworking operations.

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

Emissions Unit ID:	K007
Company Equipment ID:	Spray Booth #7
Superseded Permit Number:	P0106857
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K008
Company Equipment ID:	Spray Booth #8
Superseded Permit Number:	P0117786
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P001
Company Equipment ID:	Baghouse #1 (sanding)
Superseded Permit Number:	P0105922
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
P. Graham Dunn, Inc.
Permit Number: P0119053
Facility ID: 0285000461
Effective Date: 9/3/2015

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 [DO/LAA] 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.



Final Permit-to-Install and Operate
P. Graham Dunn, Inc.
Permit Number: P0119053
Facility ID: 0285000461
Effective Date: 9/3/2015

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.2.a)(1), B.3.a), B.4.a), B.4.b), B.5.b), B.6.a) and B.6.b)

2. Applicable Emissions Limitations and/or Control Requirements

- a) 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 and MACT)	<p>Volatile organic compound (VOC) emissions from all coating and cleanup operations from emissions units K001, K002, K003, K006, K007 and K008, combined, shall not exceed 50.0 tons per year based upon a rolling, 12-month summation.</p> <p>See B.2.b).</p> <p>Hazardous air pollutant (HAP) emissions from all coating operations (K001, K002, K003, K006, K007 and K008) shall not exceed 24.9 tons per year of total combined HAPs and 9.9 tons per year of any individual HAP based on a rolling, 12-month summation.</p> <p>See B.3.a).</p>

- b) Emissions units K001, K002, K003, K006, and K007, combined, are limited to less than 25.0 tons VOC per year in existing, effective permits in order to avoid the requirements of OAC rule 3745-21-15. Because of the materials processed in these coatings operations (emissions units K001, K002, K003, K006, and K007), they fall under SIC code 2511 which would make them subject to best available technology (BAT) requirements established in OAC rule 3745-21-15. By limiting VOC emissions to less than 25.0 tons VOC per year, these coating operations (emissions units K001, K002, K003, K006, and K007) are exempt from the BAT requirements of OAC rule 3745-21-15 per OAC rule 3745-21-15(A)(2)(a).

Emissions unit K008 cannot process the same materials as emissions units K001, K002, K003, K006, and K007 and, because of the materials that it can process, falls under SIC code 2499 which is a process code that is not subject to OAC rule 3745-21-15. The 50.0 tons VOC per year emissions limitation for emissions units K001, K002, K003, K006, K007, and K008, combined, allows the permittee flexibility to utilize emissions unit K008 with emissions in excess of 25.0 tons VOC per year provided that overall facility VOC emissions from all the coating lines do not exceed 50.0 tons VOC per year.

3. Operational Restrictions

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

Month(s)	Maximum Allowable Cumulative Emissions of VOC from Emissions Unis K001, K002, K003, K006, K007 and K008, combined (tons)	Maximum Allowable Cumulative Emissions of Each Individual HAP Facility-wide (tons)	Maximum Allowable Cumulative Emissions of Total Combined HAPs Facility-wide (tons)
1	4.2	0.83	2.1
1-2	8.3	1.7	4.2
1-3	12.5	2.5	6.2
1-4	16.7	3.3	8.3
1-5	20.8	4.1	10.4
1-6	25.0	5.0	12.5
1-7	29.2	5.8	14.5
1-8	33.3	6.6	16.6
1-9	37.5	7.4	18.7
1-10	41.7	8.3	20.8
1-11	45.8	9.1	22.8
1-12	50.0	9.9	24.9

After the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitations for VOC, each individual HAP and total combined HAPs shall be

based upon a rolling, 12-month summation of the emissions of VOC, each individual HAP and total combined HAPs.

4. Monitoring and/or Recordkeeping Requirements

- a) The permittee shall calculate and record the following information each month for emissions units K001, K002, K003, K006, K007 and K008, combined:
- (1) the company identification for each coating and cleanup material employed;
 - (2) the number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;
 - (3) the VOC content of each coating and cleanup material, as applied, in pounds per gallon;
 - (4) the total monthly VOC emissions, in tons, from emissions units K001, K002, K003, K006, K007 and K008, combined;
 - (5) the rolling, 12-month summation of the VOC emissions, in tons from emissions units K001, K002, K003, K006, K007 and K008, combined;
 - (6) the actual individual HAP¹ content and the total combined HAPs content, in pounds per gallon, for each coating and cleanup material;
 - (7) the rolling, 12-month summation of each individual HAP emissions, in tons from emissions units K001, K002, K003, K006, K007 and K008, combined; and
 - (8) the rolling, 12-month summation of the total combined HAPs emissions, in tons, from emissions units K001, K002, K003, K006, K007 and K008, combined.

¹ 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.

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

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

5. Reporting Requirements

- a) All applications, notifications or reports required by the terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through 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 District Office or Local Air Agency, 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 by Air Services.

- b) 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. 50.0 tons of VOC emissions per rolling, 12-month period from all the coatings and cleanup materials for emissions units K001, K002, K003, K006, K007 and K008, combined.
 - b. Facility-wide emissions shall not exceed:
 - i. 9.9 tons per year of each individual HAP, based upon a rolling, 12-month summation of monthly emissions; and
 - ii. 24.9 tons per year of total combined HAPs, based upon a rolling, 12-month summation of monthly emissions;
 - (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).

6. Testing Requirements

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

(1) Emission Limitation:

VOC emissions from all coating and cleanup operations from emissions units K001, K002, K003, K006, K007 and K008, combined, shall not exceed 50.0 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in B.4.a).

(2) Emission Limitations:

HAP emissions from all coating operations (K001, K002, K003, K006, K007 and K008) shall not exceed 24.9 tons per year of total combined HAPs and 9.9 tons per year of any individual HAP based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in B.4.b).

- b) USEPA Method 24 or formulation data shall be used to determine the VOC contents of the coatings and cleanup materials.

7. Miscellaneous Requirements

- a) The facility's PTE is below the 40 CFR Part 63, Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, thresholds of 10 tons per year for any individual HAP and 25 tons per year for total combined HAPs. If the rolling, 12-month emissions for each individual or total combined HAPs exceed the 10 tons per year or 25 tons per year emission limitations, this facility will be subject to Subpart JJ and will be required to comply with the major source requirements outlined in the subpart within 365 days after exceeding the emission limitations.



Final Permit-to-Install and Operate
P. Graham Dunn, Inc.
Permit Number: P0119053
Facility ID: 0285000461
Effective Date: 9/3/2015

C. Emissions Unit Terms and Conditions

1. K007, Spray Booth #7

Operations, Property and/or Equipment Description:

Inline, automatic spray booth for the spray application of texture coating to mounted paper prints.

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. None.

(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)c

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 3745-31-05(A)(3), as effective 11/30/01	See b)(2)a, b, c, and d.
b.	OAC rule 3745-31-05(E), as effective 12/1/06	See b)(2)a, b, c, and e.
c.	OAC rule 3745-31-05(D)	See B.2.a)(1)
d.	OAC rule 3745-17-11(C)	See c)(1), c)(2) and d)(1) through d)(5).
e.	OAC rule 3745-21-09(F)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A) and (E).

(2) Additional Terms and Conditions

a. The volatile organic compounds (VOC) emissions from coatings shall not exceed 2.24 pounds per hour. This limit is based upon the maximum coating application rate of 3.5 gallons per hour.

- b. The VOC emissions from this emissions unit shall not exceed 9.81 tons per year, as a rolling, 12-month summation.
- c. The VOC content of coatings shall not exceed 0.64 pound per gallon, as applied.
- d. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B.265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S.EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and U.S.EPA approves the revisions to OAC rule 3745-31-05, the requirements to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S.EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits no longer apply.
- e. This rule paragraph applies once U.S.EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOCs are less than ten tons per year.

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) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

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 modification 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.
- (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 inspection, 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 the 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.

- (5) 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.
- (6) The permittee shall collect and record the following information each month for the coating line and shall maintain this information at the facility for a period of three years:
 - a. the name and identification number of each coating, as applied; and
 - b. the mass of VOC per volume (pounds/gallon) of each coating, excluding water and exempt solvents, as applied, calculated as follows for $C_{VOC,2}$:

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

where:

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

$$W_{VOC} = W_{VM} - W_W - W_{ES}$$

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

$$V_{VOC} = V_{VM} - V_W - V_{ES}$$

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

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

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

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

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

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

This information does not have to be kept on a line-by-line basis, unless one or more of the lines or emissions units is subject to specific gallons/year and/or tons/year limitation in a Permit-to-install, where the above-mentioned information shall be maintained separately for each such line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

- (7) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:
- a. the number of gallons of each coating applied or the number of gallons of all coatings applied during the month;
 - b. the maximum VOC content (excluding water and exempt solvents) of each coating applied; or the maximum VOC content (excluding water and exempt solvents) for any coating applied, in pounds per gallon, as calculated for $C_{VOC,2}$ above;
 - c. the total VOC emissions from all coatings applied, i.e., the summation of the products of “a” times “b” for all the individual coatings applied during the month; or the product of the maximum VOC content of any coating applied times the total gallons of coating employed during the month, i.e., “a” times “b” for worst case coating;
 - d. the name and identification of each cleanup material employed;
 - e. the VOC content of each cleanup material, in pounds per gallon;
 - f. the number of gallons of each cleanup material employed;
 - g. the total VOC emission rate from all cleanup materials, in pounds or tons, i.e., the summation of the products of “e” times “f” for all cleanup materials employed;
 - h. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of “c” and “g”.

- i. the total number of hours the emissions unit was in operation; and
- j. the average hourly VOC emission rate for all coatings, i.e., (c)/(i), in lbs/hr.

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

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

The permittee shall identify the following information in the annual permit evaluation report:

- a. any daily record showing that the dry filters were not in service when the emissions unit was in operation and a copy of such record;
- b. each day during which the average VOC emissions from the coatings exceeded 2.24 pounds per hour, and the actual average VOC emissions for each such day;
- c. each day during which the VOC content of any coating exceeded 0.64 pounds per gallon, and the actual VOC content of each such coating employed;
- d. any exceedence of the annual VOC emission limitation of 9.81 tons per year, as a rolling, 12-month summation, and the actual VOC emissions during each such period; and
- e. the total VOC emissions from this emissions unit for the previous calendar 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:

The volatile organic compounds (VOC) emissions from coatings shall not exceed 2.24 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated by the average daily values calculated in d)(7)j based upon the record keeping requirements specified in d)(7).



b. Emission Limitation:

The VOC emissions from all coatings and cleanup materials from this emissions unit shall not exceed 9.81 tons per year, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon a summation of the record keeping requirements specified in d)(7).

c. Emission Limitation:

The VOC content of coatings shall not exceed 0.64 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(6).

Any determination of VOC content, solids contents, or density of coating material or cleanup material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings or cleanup material by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

g) Miscellaneous Requirements

- (1) None.

2. K008, Spray Booth #8

Operations, Property and/or Equipment Description:

Automatic spray booth #8 (Cefla, Ecosprayer ROC3-D) for the application of coatings to wood products.

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)f, d)(6) through d)(9) and e)(3)

(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)d

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.	ORC 3704.03(T)	The emission limitations established pursuant to this rule are equivalent to the emission limitations established pursuant to OAC rule 3745-31-05(D) for volatile organic compound (VOC) emissions.
b.	OAC rule 3745-31-05(A)(3) June 30, 2008	The emission limitation established pursuant to this rule is equivalent to the requirements established pursuant to OAC rule 3745-17-11(C) for particulate emissions (PE). See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	See b)(2)b.
d.	OAC rule 3745-31-05(D)	See B.2.a)(1)
e.	OAC rule 3745-17-11(C)	See c)(1), c)(2) and d)(1) through d)(5).
f.	ORC 3704.03(F)(4)(d) and OAC rule 3745-114-01	See d)(6) through d)(9) and e)(3).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	OAC rule 3745-21-07(M)(2)	See b)(2)c.

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit 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. 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 Ohio SIP.
- c. In accordance with OAC rule 3745-21-07(M)(3)(a), OAC rule 3745-21-07(M)(2) is not applicable because these emissions units are not equipped with control devices for OC emissions.

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) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

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 modification 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.
- (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 inspection, 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 the 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.

- (5) 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.
- (6) The FEPTIO application for this/these emissions unit(s), K008, was evaluated based on the actual materials and the design parameters of the emissions unit's(s) exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) 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 contaminant(s) emitted at over one ton per year 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(s) 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., “24” hours per day and “7” 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):

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

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: xylene

TLV (mg/m³): 434.19

Maximum Hourly Emission Rate (g/s): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 373.21

MAGLC (ug/m³): 10,337.91

The permittee, has demonstrated that emissions of xylene, from emissions unit(s) K008, 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).

e. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: toluene

TLV (mg/m³): 75.36

Maximum Hourly Emission Rate (g/s): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 812.29

MAGLC (ug/m3): 1794.33

The permittee, has demonstrated that emissions of toluene, from emissions unit(s) K008, 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(s), 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 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.
- e) Reporting Requirements
- (1) 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 District Office or Local Air Agency, 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.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.
 - (3) 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 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.



Final Permit-to-Install and Operate

P. Graham Dunn, Inc.

Permit Number: P0119053

Facility ID: 0285000461

Effective Date: 9/3/2015

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. None.

g) Miscellaneous Requirements

(1) None.

3. P001, Baghouse #1 (sanding)

Operations, Property and/or Equipment Description:

CHC routes, saws, routers, shapers and sanders controlled by a 39,400 acfmbaghouse, as the associated wood waste silo load-out

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. None.

(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. None.

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 3745-31-05(A)(3), as effective 11/30/01 (PTI 02-22678)	Particulate emissions (PE) shall not exceed 9.9 tons/yr from the woodworking operations and silo unloading. See b)(2)c.
b.	OAC rule 3745-17-11(B)	PE shall not exceed 3.71 lbs/hr from the dust collector exhaust.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-17-08(B)	See b)(2)a.
e.	OAC rule 3745-17-07(B)	See b)(2)b.
f.	OAC rule 3745-31-05(C), as effective 12/1/06	Particulate emissions (PE) shall not exceed 9.9 tons/yr from the woodworking operations and silo unloading. See b)(2)d.

(2) Additional Terms and Conditions

- a. The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- b. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B.265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S.EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and U.S.EPA approves the revisions to OAC rule 3745-31-05, the requirements to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S.EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits no longer apply.
- d. This rule paragraph applies once U.S.EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to Install (PTI) 02-22678 and Permit to Install and Operate (PTIO) P0105922 for this air contaminant source takes into account the use of a baghouse system, whenever this air contaminant source is in operation, with a minimum control efficiency of 99.9% and capture efficiency of 100%, by weight for PE, and the use of telescopic tube or other drop height reduction equipment during wood waste unloading, as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

The pressure drop across the baghouse shall be maintained within the range recommended by the manufacturer while the emissions unit is in operation.

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) The permittee shall perform daily checks, when the emissions unit is in operation for any visible fugitive particulate emissions at the sawdust capture system pickup points. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that

no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

- (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

The permittee shall identify the following information in the annual permit evaluation report:

- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
- b. any corrective actions taken to minimize or eliminate the visible particulate emissions;
- c. all days during which any visible fugitive particulate emissions were observed from the sawdust capture system pickup points serving this emissions unit; and
- d. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions; and
- e. the permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the manufacturer's recommended range.

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:

PE shall not exceed 3.71 lbs/hr from the dust collector exhaust.

Applicable Compliance Method:

If required, compliance with the PE limitation above shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.



b. Emission Limitation:

PE shall not exceed 9.9 tons/yr from the woodworking operations and silo unloading.

Applicable Compliance Method:

Compliance with the annual allowable PE limitation shall be determined by the following equation:

$$[(0.055 \text{ gr/dscf}) \times (39,400 \text{ cfm}) \times (60 \text{ min/hr}) \times (8760 \text{ hr/yr}) \times (\text{lb}/7000 \text{ gr}) \times (\text{ton}/2000 \text{ lb}) \times (1-0.999)] + [(SD) \times (2 \text{ lbs/ton}) \times (\text{ton}/2000 \text{ lb}) \times (1-0.75)]$$

where:

0.055 gr/dscf is the particulate emission factor from AP-42, Table 10.4-1 version 2/80;

39,400 cfm is the dust collector air flow rate from the permit application;

99.9% is the dust collector control efficiency;

SD is the total tons of sawdust loaded out per year, the rated maximum being 205 tons per year;

2 lbs/ton is the particulate emission factor from AP-42, Table 10.4-1 (2/80) for sawdust loadout; and

75% is the control efficiency for a telescopic tube from RACM, Table 2.17-3.

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) None.