Ohio Environmental Protection Agency

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

Certified Mail

11/16/2015

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

Lamar Troyer
Mullet Cabinets Inc
7488 SR 241
Millersburg, OH 44654

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0238000104
Permit Number: P0119774
Permit Type: Renewal
County: Holmes

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)963-1200or 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
Mullet Cabinets Inc

Facility ID:	0238000104
Permit Number:	P0119774
Permit Type:	Renewal
Issued:	11/16/2015
Effective:	11/16/2015
Expiration:	11/16/2019

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Mullet Cabinets Inc

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Authorization

Facility ID:	0238000104
Application Number(s):	A0054630, A0054631, A0054632, A0054633
Permit Number:	P0119774
Permit Description:	Renewal FEPTIO for a wood products coating operation - emissions units R001, R002, R003, R005, R006, R007 and R008.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	11/16/2015
Effective Date:	11/16/2015
Expiration Date:	11/16/2019

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Mullet Cabinets Inc
7488 SR 241
Millersburg, OH 44654

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

Authorization (continued)

Permit Number: P0119774
Permit Description: Renewal FEPTIO for a wood products coating operation - emissions units R001, R002, R003, R005, R006, R007 and R008.

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

Group Name: Wood Products Coating Operation

Emissions Unit ID:	**R001**
Company Equipment ID:	Spray Booth #1
Superseded Permit Number:	P0105705
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R002**
Company Equipment ID:	Spray Booth #2
Superseded Permit Number:	P0105705
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R003**
Company Equipment ID:	Spray Booth #3
Superseded Permit Number:	P0105705
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R005**
Company Equipment ID:	Spray Booth #5
Superseded Permit Number:	P0105705
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R006**
Company Equipment ID:	R006
Superseded Permit Number:	P0105942
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R007**
Company Equipment ID:	Spray Booth #7 (R007)
Superseded Permit Number:	P0109949
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**R008**
Company Equipment ID:	Spray Booth #8 (EU R008)
Superseded Permit Number:	P0112176
General Permit Category andType:	Not Applicable

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 beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

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.

2. Facility-wide Requirements:

   a) Applicable Emissions Limitations and/or Control Requirements

      (1) In accordance with OAC rule 3745-31-05 (D)(1)(b), the permittee proposed the following restrictions to avoid Title V requirements and MACT requirements under 40 Code of Federal Register Part 63, Subpart JJ, Standards for Hazardous Air Pollutant Emissions From Wood Furniture Manufacturing Operations:

         a. facility-wide VOC emissions shall not exceed 79.0 tons per year, based upon a rolling, 12-month summation of VOC emissions;

         b. facility-wide emissions of each individual hazardous air pollutant (HAP) shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation; and

         c. facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation.

   b) Operational Restrictions

      (1) None.

   c) Monitoring and/or Recordkeeping Requirements:

      (1) The permittee shall maintain the following facility-wide information each month:

         a. the monthly VOC emissions, in tons per month;

         b. the rolling, 12-month summation of total VOC emissions, in tons;

         c. the monthly individual HAP emissions, in tons per month;

         d. the rolling, 12-month summation of individual HAP emissions, in tons;

e. the monthly total combined HAP emissions, in tons per month; and

f. the rolling, 12-month summation of total combined HAP emissions, in tons.

d) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. facility-wide VOC emissions shall not exceed 79.0 tons per year, based upon a rolling, 12-month summation of VOC emissions;

ii. facility-wide emissions of each individual HAP shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation; and

iii. facility-wide emissions of total combined HAP shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Ohio EPA Northeast District Office).

e) Testing Requirements

(1) Compliance with the allowable emission limitations in B.2.a)(1) above shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u>

Facility-wide VOC emissions shall not exceed 79.0 tons per year, based upon a rolling, 12-month summation of VOC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in B.2.c)(1)b.

b. Emission Limitation:

Facility-wide emissions of each individual HAP shall not exceed 9.90 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.2.c)(1)d.

c. Emission Limitation:

Facility-wide emissions of total combined HAP shall not exceed 24.90 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.2.c)(1)f.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Wood Products Coating Operation: R001, R002, R003, R005, R006, R007, R008

EU ID	Operations, Property and/or Equipment Description
R001	Spray booth #1 for the application of coatings to wood cabinets.
R002	Spray booth for the application of coatings to wood cabinets.
R003	Spray booth for the application of coatings to wood cabinets.
R005	Coating spray booth 5 for the application of coatings to wood cabinets and trim, followed by a drying oven.
R006	Laminate counter top manufacturing area including two HVLP pressure pots to apply adhesive.
R007	Spray booth #7 for the application of coatings to wood products, followed by a drying oven.
R008	Crossdraft, spray booth for the manual spray application of stain, glaze, finish, primer, and paint 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. d)(5), d)(6), d)(7), d)(8), 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)(2)c., d)(4), e)(2), f)(1)c., f)(1)d., and f)(1)e.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(C)	See c)(1), d)(9), d)(10), d)(11), d)(12), and d)(13) below.
b.	OAC rule 3745-31-05(A)(3) June 30, 2008	See b)(2)a., b)(2)b. and b)(2)c. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from R001, R002, R007 and R008 since the potential to emit is less than 10 tons/year, taking into account the federally enforceable rule limits under OAC rule 3745-31-05(D)(1)(b). See b)(2)d. and b)(2)e. below.
d.	OAC rule 3745-31-05(D)(1)(b)	See b)(2)e. below.
e.	ORC 3704.03(F)(4)	See b)(2)f., d)(5), d)(6), d)(7), d)(8), and e)(3) below.

(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. On any day during which coatings are employed, the VOC emissions from all the coatings shall not exceed the following:

i. for emissions unit R001, 11.56 pounds per hour;

ii. for emissions unit R002, 16.80 pounds per hour;

iii. for emissions unit R003, 14.46 pounds per hour;

iv. for emissions unit R005, 14.50 pounds per hour;

v. for emissions unit R006, 3.87 pounds per hour;

vi. for emissions unit R007, 14.28 pounds per hour; and

vii. for emissions unit R008, 15.06 pounds per hour.

c. The VOC content of each coating, as applied, shall not exceed the following:

i. for emissions unit R001, 5.78 pounds per gallon;

ii. for emissions unit R002, 6.72 pounds per gallon;

iii. for emissions unit R003, 5.78 pounds per gallon;

iv. for emissions unit R005, 5.78 pounds per gallon;

v. for emissions unit R006, 3.87 pounds per gallon;

vi. for emissions unit R007, 5.71 pounds per gallon; and

vii. for emissions unit R008, 6.02 pounds per gallon.

d. 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.

e. The permittee proposed the following restrictions to avoid Title V requirements, as well as MACT requirements under 40 Code of Federal Register Part 63, Subpart JJ, Standards for Hazardous Air Pollutant Emissions From Wood Furniture Manufacturing Operations:

i. VOC emissions from all coatings and cleanup materials shall not exceed the following:

(a) for emissions unit R001, 9.27 tons per year, based upon a rolling, 12-month summation of VOC emissions;

(b) for emissions unit R002, 10.68 tons per year, based upon a rolling, 12-month summation of VOC emissions;

(c) for emissions unit R003, 9.27 tons per year, based upon a rolling, 12-month summation of VOC emissions;

(d) for emissions unit R005, 12.20 tons per year, based upon a rolling, 12-month summation of VOC emissions;

(e) for emissions unit R006, 17.00 tons per year, based upon a rolling, 12-month summation of VOC emissions;

(f) for emissions unit R007, 8.00 tons per year, based upon a rolling, 12-month summation of VOC emissions; and

(g) for emissions unit R008, 8.00 tons per year, based upon a rolling, 12-month summation of VOC emissions.

ii. Facility-wide emissions of each individual hazardous air pollutant (HAP) shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation; and

iii. Facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation.

f. For emissions unit R006, in order to demonstrate compliance with the “Toxic Air Contaminant Statute,” the Director has established, per ORC 3704.03(F)(4)(c), a limit for hexane, which shall not exceed 26.33 pounds per day. This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule submitted in the permit application by the emission rate modeled (to determine the ground level concentration).

c) Operational Restrictions

(1) All exhaust from each spray booth, excluding R006 [see g)(2)], shall pass through the dry filters whenever the emissions unit is in operation.

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records for each emissions unit that document all time periods when any dry filters were not in service when the emissions unit was in operation.

(2) The permittee shall collect and record the following information each day for each emissions unit:

a. the company identification for each coating and cleanup material employed;

b. the VOC content of each coating and cleanup material, in lbs/gallon, as applied;

c. 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;

d. the total VOC emissions from all the coatings and cleanup materials employed, in pounds per day, i.e., sum of (b) times (c);

e. the total number of hours the emissions unit was in operation; and

f. the average hourly VOC emission rate for all the coatings, i.e., (d)/(e), in pounds per hour.

(3) The permittee shall collect and record the following information each month for each emissions unit:

a. the name or identification number of each coating and cleanup material employed;

b. the volume, in gallons, of each coating and cleanup material employed, i.e., the summation of daily coating and cleanup material usage, recorded in d)(2)c, for the month;

c. each single HAP content for each coating and cleanup material employed, in pounds per gallon;

d. the total emissions of each single HAP from all coatings and cleanup materials employed, i.e., the summation of the products of "b" times "c";

e. the combined total HAPs content for each coating and cleanup material employed, in pounds per gallon;

f. the total emissions of combined total HAPs from all coatings and cleanup materials employed, i.e., the summation of the products of “b” times “e”;

g. the total VOC emissions from all coatings and cleanup material employed, i.e., the summation of daily VOC emissions, recorded in d)(2)d above, for the month; and

h. The rolling, 12-month summation of total VOC emissions, in tons.

(4) The permittee shall keep the following facility-wide information each month:

a. the monthly single HAP emissions, in tons per month;

b. the rolling, 12-month summation of each single HAP emissions, in tons;

c. the monthly combined total HAPs emissions, in tons per month; and

d. the rolling, 12-month summation of combined total HAPs emissions, in tons.

(5) The FEPTIO for emissions units R001, R002, R003, R005, R006, R007 and R008 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit application. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to these emissions units 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 SCREEN 3.0, 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., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 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):

i. Toxic Contaminant: n-butyl acetate

TLV (mg/m^3): 713

Maximum Hourly Emission Rate (lbs/hr): 14.20

Predicted 1-Hour Maximum Ground Level Concentration (ug/m^3): 1,412

MAGLC (ug/m^3): 16,976

ii. Toxic Contaminant: ethanol

TLV (mg/m^3): 1,880

Maximum Hourly Emission Rate (lbs/hr): 16.84

Predicted 1-Hour Maximum Ground Level Concentration (ug/m^3): 1,793

MAGLC (ug/m^3): 44,762

iii. Toxic Contaminant: ethyl acetate

TLV (mg/m^3): 1,440

Maximum Hourly Emission Rate (lbs/hr): 2.643

Predicted 1-Hour Maximum Ground Level Concentration (ug/m^3): 182

MAGLC (ug/m^3): 34,286

iv. Toxic Contaminant: isobutyl acetate

TLV (mg/m^3): 532

Maximum Hourly Emission Rate (lbs/hr): 4.40

Predicted 1-Hour Maximum Ground Level Concentration (ug/m^3): 671

MAGLC (ug/m^3): 12,667

v. Toxic Contaminant: isobutyl alcohol

TLV (mg/m^3): 152

Maximum Hourly Emission Rate (lbs/hr): 4.28

Predicted 1-Hour Maximum Ground Level Concentration (ug/m^3): 652

MAGLC (ug/m^3): 3,619

vi. Toxic Contaminant: isopropyl acetate

TLV (mg/m^3): 713

Maximum Hourly Emission Rate (lbs/hr): 1.86

Predicted 1-Hour Maximum Ground Level Concentration (ug/m^3): 182

MAGLC (ug/m^3): 16,976

vii. Toxic Contaminant: toluene

TLV (mg/m^3): 75.36196

Maximum Hourly Emission Rate (lbs/hr): 2.38

Predicted 1-Hour Maximum Ground Level Concentration (ug/m^3): 155.91

MAGLC (ug/m^3): 1794.33

The permittee, has demonstrated that emissions of n-butyl acetate, ethanol, ethyl acetate, isobutyl acetate, isobutyl alcohol, isopropyl acetate and toluene from emissions units R001, R002, R003, R005, R007 and R008 are calculated to be less than eighty percent 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).

viii. Toxic Contaminant: hexane

TLV (mg/m^3): 176.2

Maximum Hourly Emission Rate (lbs/hr): 1.199

Predicted 1-Hour Maximum Ground Level Concentration (ug/m^3): 4,144

MAGLC (ug/m^3): 4,145

The permittee, having demonstrated that emissions of hexane, from emissions unit R006, is estimated to be equal or greater than eighty percent, but less than 100 percent of the maximum allowable ground level concentration (MAGLC), shall not operate the emissions unit at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and 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).

(6) Prior to making any physical changes to or changes in the method of operation of the emissions units, 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" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of these emissions units, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

(7) 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.

(8) 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.

(9) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, and/or operating manuals for the overspray filters with any modifications deemed necessary by the permittee during the time period in which the overspray filters are utilized.

(10) The permittee shall operate the overspray filters in accordance with the manufacturer's recommendations, instructions, and/or operating manuals with any modifications deemed necessary by the permittee.

(11) The permitee shall conduct periodic inspections of the overspray filters to determine whether the filters are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each overspray filter shall be performed at a frequency that is based upon the recommendation of the manufacturer of the overspray filter, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the overspray filter while the emissions unit is shut down and perform any needed maintenance and repair for the overspray filter to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

(12) The permittee shall document each inspection of the overspray filters by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.

(13) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

(1) The permittee shall notify the Director in writing of any daily record for this emissions unit that show the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. VOC emissions from all coatings and cleanup materials shall not exceed the following:

(a) for emissions unit R001, 9.27 tons per year, based upon a rolling, 12-month summation of VOC emissions;

(b) for emissions unit R002, 10.68 tons per year, based upon a rolling, 12-month summation of VOC emissions;

(c) for emissions unit R003, 9.27 tons per year, based upon a rolling, 12-month summation of VOC emissions;

(d) for emissions unit R005, 12.20 tons per year, based upon a rolling, 12-month summation of VOC emissions;

(e) for emissions unit R006, 17.00 tons per year, based upon a rolling, 12-month summation of VOC emissions;

(f) for emissions unit R007, 8.00 tons per year, based upon a rolling, 12-month summation of VOC emissions; and

(g) for emissions unit R008, 8.00 tons per year, based upon a rolling, 12-month summation of VOC emissions.

ii. Facility-wide emissions of each single hazardous air pollutant (HAP) shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of each single HAP emissions; and

iii. Facility-wide emissions of combined total HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of combined total HAPs.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Ohio EPA Northeast District Office).

(3) The permittee shall also submit annual reports to the Ohio EPA, Northeast District Office, documenting any changes made to a parameter or value used in the dispersion model (including the air toxic compounds emitted and the emission rate), 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. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect.

(4) The permittee shall also submit annual reports that specify the total facility VOC emissions, for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions units in the annual Fee Emission Report.

(5) 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 permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the allowable emission limitations in b)(1) and b)(2) above shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>

On any day during which coatings are employed, the VOC emissions from all the coatings shall not exceed the following:

i. for emissions unit R001, 11.56 pounds per hour;

ii. for emissions unit R002, 16.80 pounds per hour;

iii. for emissions unit R003, 14.46 pounds per hour;

iv. for emissions unit R005, 14.50 pounds per hour;

v. for emissions unit R006, 3.87 pounds per hour;

vi. for emissions unit R007, 14.28 pounds per hour; and

vii. for emissions unit R008, 15.06 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2) above.

b. Emission Limitation:

VOC content of each coating shall not exceed the following:

i. for emissions unit R001, 5.78 pounds per gallon;

ii. for emissions unit R002, 6.72 pounds per gallon;

iii. for emissions unit R003, 5.78 pounds per gallon;

iv. for emissions unit R005, 5.78 pounds per gallon;

v. for emissions unit R006, 3.87 pounds per gallon;

vi. for emissions unit R007, 5.71 pounds per gallon; and

vii. for emissions unit R008, 6.02 pounds per gallon.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2)b.

c. Emission Limitation:

VOC emissions from all coatings and cleanup materials shall not exceed the following:

i. for emissions unit R001, 9.27 tons per year, based upon a rolling, 12-month summation of VOC emissions;

ii. for emissions unit R002, 10.68 tons per year, based upon a rolling, 12-month summation of VOC emissions;

iii. for emissions unit R003, 9.27 tons per year, based upon a rolling, 12-month summation of VOC emissions;

iv. for emissions unit R005, 12.20 tons per year, based upon a rolling, 12-month summation of VOC emissions;

v. for emissions unit R006, 17.00 tons per year, based upon a rolling, 12-month summation of VOC emissions;

vi. for emissions unit R007, 8.00 tons per year, based upon a rolling, 12-month summation of VOC emissions; and

vii. for emissions unit R008, 8.00 tons per year, based upon a rolling, 12-month summation of VOC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3)h.

d. Emission Limitation:

Facility-wide emissions of each single HAP shall not exceed 9.90 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 section d)(4).

e. Emission Limitation:

Facility-wide emissions of combined total HAPs shall not exceed 24.90 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 section d)(4).

f. Emission Limitation:

Hexane emissions from R006 shall not exceed 26.33 pounds per day.

Applicable Compliance Method:

Compliance shall be based upon the following:

E_{Hexane}= (CT)(M)(AT)

Where,

E_{Hexane}= daily hexane emissions, in pounds per day;

CT = the gallons of coating applied per day (maximum 24 gallons per day);

M = the coating density, in pounds per gallon (6.65 pounds per gallons is the current adhesive density); and

AT = the percent, by weight, of hexane in the coating (16.5% of hexane in current adhesive).

(2) USEPA Method 24 or formulation data shall be used to determine the VOC content of each coating and cleanup material.

(3) Formulation data shall be used to determine the contents of each individual HAP and total combined HAPs.

g) Miscellaneous Requirements

(1) For emissions unit R006, in accordance with OAC rule 3745-21-07(M)(3)(a), OAC rule 3745-21-07(M)(2) is not applicable because the emissions unit is not equipped with OC emissions control devices.

(2) For emission unit R006, operational restrictions and recordkeeping requirements do not apply because it is not equipped with a dry filtration system (fugitive source).