Ohio Environmental Protection Agency

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

Certified Mail

4/12/2016

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	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

Mr. Christopher Karman
Daniel's Amish Collection LLC
9190 Massillon Road
Dundee, OH 44624

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0238042001
Permit Number: P0120336
Permit Type: Initial Installation
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**
- **What should you do if you notice a spill or environmental emergency?**

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.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, 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
Daniel's Amish Collection LLC

Facility ID:	0238042001
Permit Number:	P0120336
Permit Type:	Initial Installation
Issued:	4/12/2016
Effective:	4/12/2016
Expiration:	10/18/2020

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Daniel's Amish Collection LLC

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Authorization

Facility ID:	0238042001
Application Number(s):	A0055384
Permit Number:	P0120336
Permit Description:	Initial installation of an automatic inline coating booth for the application of topcoat/sealer to wood furniture with fiberglass filters for particulate control
Permit Type:	Initial Installation
Permit Fee:	$200.00
Issue Date:	4/12/2016
Effective Date:	4/12/2016
Expiration Date:	10/18/2020

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

This document constitutes issuance to:

Daniel's Amish Collection LLC
100 Straits Lane
Killbuck, OH 44637

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: P0120336
Permit Description: Initial installation of an automatic inline coating booth for the application of topcoat/sealer to wood furniture with fiberglass filters for particulate control

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

Emissions Unit ID:	**K008**
Company Equipment ID:	Inline Spray Booth #1
Superseded Permit Number:	
General Permit Category and Type:	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) None.

2. Facility-Wide Emissions Limitations:

   a) The permittee proposed the following restrictions to avoid Title V requirements, as well as MACT requirements under 40 CFR Part 63, Subpart JJ, Standards for Hazardous Air Pollutant Emissions From Wood Furniture Manufacturing Operations:

      (1) the combined volatile organic compound (VOC) emissions from emissions units K001 - K008 shall not exceed 79.0 tons per year (tpy), based upon a rolling, 12-month summation;

      (2) facility-wide emissions of each individual hazardous air pollutant (HAP) shall not exceed 9.9 tpy, based upon a rolling, 12-month summation; and

      (3) facility-wide emissions of total combined HAPs shall not exceed 24.9 tpy, based upon a rolling, 12-month summation.

   b) Monitoring and/or Recordkeeping Requirements

      (1) The permittee shall maintain monthly records of the total VOC emissions during the rolling, 12-month period, calculated by adding emissions for the present month to the preceding 11 months of operation for each emissions unit, in tons. Monthly emissions shall be calculated in accordance with Section C of this permit.

      (2) The permittee shall collect and record the following information each month for all materials containing any HAP[1] that are applied in the emissions units:

         a. the name and identification number/code of each coating, cleanup, and any other material containing any HAP;

         b. the name/identification of each individual HAP contained in each material applied (and identified in (a) above) and the pound(s) of each HAP/gallon of each HAP-containing material applied;

         c. the number of gallons of each coating, cleanup, and any other HAP-containing material applied during the month;

d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of (b) times (c) for all the materials applied during the month, divided by 2,000 pounds/ton;

e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from (d) above;

f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in (d) above, for the present month plus the previous 11 months of operation, in ton(s); and

g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in (e) above, for the present month plus the previous 11 months of operation, in ton(s).

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA Northeast District Office agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

c) 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. all exceedances of the rolling, 12-month VOC emission limitation;

ii. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the coatings and cleanup materials employed; and

iii. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all the coatings and cleanup materials employed.

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 Ohio EPA Northeast District Office.

d) Testing Requirements

a. Emission Limitation:

The combined VOC emissions from emissions units K001- K008 shall not exceed 79.0 tpy, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping and reporting requirements specified in b) and c).

b. Emission Limitation:

Facility-wide emissions of each individual HAP shall not exceed 9.9 tpy, based upon a rolling, 12-month summation.

Facility-wide emissions of total combined HAPs shall not exceed 24.9 tpy, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping and reporting requirements specified in b) and c).

C. Emissions Unit Terms and Conditions

1. K008, Inline Spray Booth #1

Operations, Property and/or Equipment Description:

Inline spray booth for automatic spraying of surface coatings to wood products: Makor, Model EKOS

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)(9), d)(10), d)(11), d)(12) and e)(4)

(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)b

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)	VOC content, in pound VOC/pound solids (lb/lb), as applied, shall not exceed: 1.8 lb/lb for any topcoat; and 1.9 lb/lb for any sealer. When using acid-cured alkyd amino products VOC content, as applied, shall not exceed: 2.0 lb/lb for conversion varnish topcoats; and 2.3 lb/lb for sealers. See b)(2)a.
b.	OAC rule 3745-31-05(D)	See B.2.
c.	OAC rule 3745-17-11(C)	See c)(1).
d.	ORC 3704.03(F)(4)(c)	See d)(9), d)(10), d)(11), d)(12) and e)(4).

(2) Additional Terms and Conditions

a. The permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation. The plan shall be developed no more than 60 days after permit issuance.

c) Operational Restrictions

(1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever the emission(s) unit(s) is/are 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) Work Practice Plan

a. *Operator training course.* Each owner or operator of an affected source shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and wash-off operations, use of manufacturing equipment, or implementation of the requirements of the work practice plan.

i. all new personnel shall be trained upon hiring. All existing personnel shall be trained within six months of permit issuance.

ii. all personnel shall be given refresher training annually.

iii. a copy of the training program shall be maintained with the work practice implementation plan.

iv. the training program shall include, at a minimum, the following:

(a) a list of all current personnel by name and job description that are required to be trained;

(b) an outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;

(c) lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and wash-off procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and

(d) a description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

b. Inspection *and maintenance plan.* Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

i. a minimum visual inspection frequency of once/month for all equipment used to transfer or apply coatings, adhesives, or VOC solvents;

ii. an inspection schedule;

iii. methods for documenting the date and results of each inspection and any repairs that were made; and

iv. the timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

(a) a first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and

(b) final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

c. *Cleaning and wash-off solvent accounting system.* Each owner or operator of an affected source shall develop a VOC solvent accounting form to record:

i. the quantity and type of VOC solvent used each month for wash-off and cleaning;

ii. the number of pieces washed off, and the reason for the wash-off; and

iii. the quantity of spent VOC solvent generated from each wash-off and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

d. *Spray booth cleaning.* Each owner or operator of an affected source shall not use compounds containing more than 8.0% by weight of VOC for cleaning spray booth components other than conveyors and their enclosures, or metal/plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of VOC solvent/booth to prepare the surface of the booth prior to applying the booth coating.

e. *Storage requirements.* Each owner or operator of an affected source shall use normally closed containers for storing finishing, gluing, cleaning, and wash-off materials.

f. *Application equipment requirements.* Each owner or operator of an affected source shall not use conventional air spray guns except when all emissions from the finishing application station are routed to a functioning control device.

g. *Line cleaning.* Each owner or operator of an affected source shall pump or drain all VOC solvent used for line cleaning into a normally closed container.

h. *Gun cleaning.* Each owner or operator of an affected source shall collect all VOC solvent used to clean spray guns into a normally closed container.

i. *Wash-off operations.* Each owner or operator of an affected source shall control emissions from wash-off operations by:

i. using normally closed tanks for wash-off; and

ii. minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

(2) The permittee shall maintain the following records for a period of not less than five years and shall make the records available to the director or any authorized representative of the director for review during normal business hours:

a. a certified product data sheet (or other formulation data sheets provided by the manufacturer) for each finishing material and any thinners or other VOC material added to the finishing materials before application;

b. a record of the VOC content, in pounds of VOC per pound of solids, as applied, of each finishing material including documentation on any thinner or other VOC added to the finishing material before application; and a description of each finishing material (i.e., topcoat, sealer, or acid-cured alkyd amino topcoat, sealer); and

c. an onsite copy of the work practice implementation plan and all the records required under that plan as outlined in section d)(1) above.

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

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

b. 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;

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

d. the total VOC emissions from all the coatings and cleanup materials, in tons/mon; and

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

(4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the Ohio EPA Northeast District Office upon request.

(5) 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.

(6) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(7) 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.

(8) 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.

(9) The FEPTIO application for emissions units, 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 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/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 work week, 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 ACGIH TLVs 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/day and Y days/week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the 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: toluene
   TLV (mg/m3): 75.36
   Maximum Hourly Emission Rate (lbs/hr): 5.28
   Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 699.61
   MAGLC (ug/m3): 1794.33

   Toxic Contaminant: xylene
   TLV (mg/m3): 434.19
   Maximum Hourly Emission Rate (lbs/hr): 1.14
   Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 148.04
   MAGLC (ug/m3): 10,338

Toxic Contaminant: ethyl benzene
TLV (mg/m3): 434.19
Maximum Hourly Emission Rate (lbs/hr): 0.30
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 39.59
MAGLC (ug/m3): 10,338

The permittee, has demonstrated that emissions of toluene, xylene and ethyl benzene from emissions unit(s) K008 are calculated to be less than 80% of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with ORC 3704.03(F).

(10) 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 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 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.

(11) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with 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 MAGLC for each significant toxic contaminant or worst-case contaminant, calculated in accordance with 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 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 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.

(12) 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 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) 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 an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

(3) The permittee shall identify in the annual PER any time period, to include the specific dates, during which the work practice plan requirements were not followed. If there were no deviations from the work practice plan requirements then the report shall include a statement to this effect.

(4) 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 groundlevel concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

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:

VOC content, in pound VOC/pound solids (lb/lb), as applied, shall not exceed:

1.8 lb/lb for any topcoat; and
1.9 lb/lb for any sealer.

When using acid-cured alkyd amino products VOC content, as applied, shall not exceed:

2.0 lb/lb for conversion varnish topcoats; and
2.3 lb/lb for sealers.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping and reporting requirements specified in d) and e).

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

g) Miscellaneous Requirements

(1) None.