



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
SUMMIT COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 16-02358

DATE: 7/27/2004

Leiden Cabinet Co
Russ Leiden
1375 E 55th St
Cleveland, OH 44103

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

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

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

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

ARAQMD



**Permit To Install
Terms and Conditions**

**Issue Date: 7/27/2004
Effective Date: 7/27/2004**

FINAL PERMIT TO INSTALL 16-02358

Application Number: 16-02358
APS Premise Number: 1677130078
Permit Fee: **\$1600**
Name of Facility: Leiden Cabinet Co
Person to Contact: Russ Leiden
Address: 1375 E 55th St
Cleveland, OH 44103

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2385 Edison Blvd
Twinsburg, Ohio**

Description of proposed emissions unit(s):
Two (2) Spray Booths, One (1) Irde Coating Operation, Woodworking Equipment.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

Leiden Cabinet Co
 PTI Application: 16-02358
 Issued: 7/27/2004

Facility ID: 1677130078

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	53.76
PE	9.64

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Wood product processing equipment which includes various types of saws, sanders, etc. - Dust Collector 1.	OAC rule 3745-31-05(A)(3)	1.9 pounds of particulate emissions (PE) per hour 8.32 tons of PE per year The permittee shall employ equipment (e.g., hoods) to capture and vent the particulate emissions to a baghouse/fabric filter. Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average.
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a The hourly and annual PE emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these limits.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2 to 4.5 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

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

D. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation

1.9 pounds of PE per hour

- a. Applicable Compliance Method

Compliance shall be determined by either multiplying the maximum uncontrolled particulate emissions of 187.5 pounds of particulate emissions per hour* by (1-0.99**) or if required, by performing an emissions test in accordance with OAC rule 3745-17-03(B)(10).

*The uncontrolled emission rate was determined by the amount of wood dust collected by

the baghouse.

**Control efficiency of the baghouse.

b. Emission Limitation

8.32 tons of PE per year

Applicable Compliance Method

Compliance with the annual emission limitation shall be determined by multiplying the allowable hourly emission limitation by 8760 hours per year, then divide by 2000 pounds per ton.

c. Emission Limitation

Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average.

Applicable Compliance Method

OAC rule 3745-17-03(B)(1)

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
R001 - Makor Iride 206 automatic trim spraying machine.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
		OAC rule 3745-21-07(G)(4)
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-11	

Applicable Emissions
Limitations/Control Measures

47.3 pounds of organic compounds (OC) per day for coatings

9.12 tons of OC per year for coatings and cleanup materials

0.1 pound of particulate emissions (PE) per hour

0.44 ton of PE per year

Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-21-07(G)(4).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

When employing, applying,

evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.

Emissions of organic material to the atmosphere from the cleanup with photochemically reactive materials of any article, machine, equipment, or other contrivance, shall be included with the other emissions of organic materials from that article, machine, equipment, or other contrivance for determining compliance with OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- 2.a** The hourly and annual PE emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these limits.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the following information for the coating line:
 - a. the MSDS sheets for each coating and cleanup material currently employed;
 - b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material, as applied; and,
 - c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document prior to employing the new coating or cleanup material whether or not it is a photochemically reactive material, as applied.
2. If it is determined that a photochemically reactive material is being employed in the coating line, the permittee shall collect and record the following information for each day for the coating line:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation of whether each coating or cleanup material employed is a photochemically reactive material, as applied;
 - c. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - d. the OC content of each coating and photochemically reactive cleanup material, as applied, in pounds per gallon;
 - e. for each day during which a photochemically reactive material is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

- f. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and,
- g. for each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, (i.e., (e)/(f)), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

- 3. The permittee shall collect and record the following information for each day for the coating line:
 - a. the name and identification number of each coating and thinner employed;
 - b. the OC content of each coating and thinner, in pounds per gallon;
 - c. the number of gallons of each coating and thinner employed;
 - d. the total OC emissions from all coatings and thinners, in pounds per day (i.e., the sum of (b) times (c) for each coating and thinner).
- 4. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the total OC emissions from all cleanup materials, in tons per month (i.e., the sum of (b) times (c) for each cleanup material, then divided by 2000);
 - e. the total OC emissions from all coatings and thinners, in tons per month (i.e., the sum of the daily OC emissions in section C.3.d, then divided by 2000);
 - f. the total OC emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., (d) plus (e)).
- 5. The emissions unit shall be operated and maintained in accordance with manufacturer's recommendations. The emissions unit's exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

6. The permit to install for this emissions unit (R001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethanol

TLV (mg/m³): 1880

Maximum Hourly Emission Rate (lbs/hr): 0.81*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 42.49

MAGLC (ug/m³): 44,761.9

Pollutant: 1-butanol

TLV (mg/m³): 60.6

Maximum Hourly Emission Rate (lbs/hr): 1.25*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 65.77

MAGLC (ug/m³): 1442.9

Pollutant: acetone

TLV (mg/m³): 1186.6

Maximum Hourly Emission Rate (lbs/hr): 0.53*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 27.91

MAGLC (ug/m³): 28,252.4

Pollutant: ethyl acetate

TLV (mg/m³): 1440

Maximum Hourly Emission Rate (lbs/hr): 1.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 63.11

MAGLC (ug/m³): 34,285.7

Pollutant: n-butyl acetate

TLV (mg/m³): 713

Maximum Hourly Emission Rate (lbs/hr): 3.84*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 201.94

MAGLC (ug/m³): 16,976.2

*Combined maximum emission rate for R001, R002, and R003.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the

Emissions Unit ID: R001

application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

7. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and,
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the daily OC emissions exceeded 47.3 pounds per day, and the actual daily OC emissions for each such day.
3. The deviation reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions.

4. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitations

the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour

Applicable Compliance Method

Compliance with the hourly and daily emission limitations shall be demonstrated based on daily record keeping requirements specified by section C.2 of these terms and conditions. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and photochemically reactive cleanup materials.

- b. Emission Limitation

47.3 pounds of OC per day for coatings

Applicable Compliance Method

Compliance with the daily emission limitation shall be demonstrated based on daily record keeping requirements specified in section C.3 of these terms and conditions. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings.

c. Emission Limitation

9.12 tons of OC per year for coatings and cleanup materials

Applicable Compliance Method

Compliance with the annual emission limitation shall be demonstrated based on monthly record keeping requirements specified in section C.4 of these terms and conditions. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and cleanup materials.

d. Emission Limitation

0.1 pound of PE per hour

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined using the following equation:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

$$E = \text{particulate emissions rate (pounds per hour)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = fractional control efficiency of the control equipment

e. Emission Limitation

0.44 ton of PE per year

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by multiplying the allowable hourly emission limitation by 8760 hours per year, then divide by 2000 pounds per ton.

f. Emission Limitation

Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average

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Leider

PTI A

Issued: 7/27/2004

Emissions Unit ID: **R001**

Applicable Compliance Method

OAC rule 3745-17-03(B)(1)

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-11
R002 - Global Finishing Solutions Model Number Pyramid CF Spray Booth - Paint Spray Booth 1.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
		OAC rule 3745-21-07(G)(4)
	OAC rule 3745-17-07(A)	

Leider**PTI A****Issued: 7/27/2004**Emissions Unit ID: **R002**

Applicable Emissions <u>Limitations/Control Measures</u>	When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.
118.3 pounds of organic compounds (OC) per day for coatings	Emissions of organic material to the atmosphere from the cleanup with photochemically reactive materials of any article, machine, equipment, or other contrivance, shall be included with the other emissions of organic materials from that article, machine, equipment, or other contrivance for determining compliance with OAC rule 3745-21-07(G)(2).
22.32 tons of OC per year for coatings and cleanup materials	
0.1 pound of particulate emissions (PE) per hour	
0.44 ton of PE per year	
Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average.	
The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-21-07(G)(4).	
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	
The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).	

2. Additional Terms and Conditions

- 2.a** The hourly and annual PE emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these limits.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the following information for the coating line:
 - a. the MSDS sheets for each coating and cleanup material currently employed;
 - b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material, as applied; and,
 - c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document prior to employing the new coating or cleanup material whether or not it is a photochemically reactive material, as applied.
2. If it is determined that a photochemically reactive material is being employed in the coating line, the permittee shall collect and record the following information for each day for the coating line:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation of whether each coating or cleanup material employed is a photochemically reactive material, as applied;
 - c. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - d. the OC content of each coating and photochemically reactive cleanup material, as applied, in pounds per gallon;
 - e. for each day during which a photochemically reactive material is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

- f. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and,
- g. for each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, (i.e., (e)/(f)), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

- 3. The permittee shall collect and record the following information for each day for the coating line:
 - a. the name and identification number of each coating and thinner employed;
 - b. the OC content of each coating and thinner, in pounds per gallon;
 - c. the number of gallons of each coating and thinner employed;
 - d. the total OC emissions from all coatings and thinners, in pounds per day (i.e., the sum of (b) times (c) for each coating and thinner).
- 4. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the total OC emissions from all cleanup materials, in tons per month (i.e., the sum of (b) times (c) for each cleanup material, then divided by 2000);
 - e. the total OC emissions from all coatings and thinners, in tons per month (i.e., the sum of the daily OC emissions in section C.3.d, then divided by 2000);
 - f. the total OC emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., (d) plus (e)).
- 5. The emissions unit shall be operated and maintained in accordance with manufacturer's recommendations. The emissions unit's exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

6. The permit to install for this emissions unit (R001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethanol

TLV (mg/m³): 1880

Maximum Hourly Emission Rate (lbs/hr): 0.81*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 42.49

MAGLC (ug/m³): 44,761.9

Pollutant: 1-butanol

TLV (mg/m³): 60.6

Maximum Hourly Emission Rate (lbs/hr): 1.25*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 65.77

MAGLC (ug/m³): 1442.9

Pollutant: acetone

TLV (mg/m³): 1186.6

Maximum Hourly Emission Rate (lbs/hr): 0.53*

Predicted 1-Hour Maximum Ground-Level

Leiden Cabinet Co
PTI Application: 16-02259
Issued

Facility ID: 1677130078

Emissions Unit ID: R002

Concentration (ug/m3): 27.91

MAGLC (ug/m3): 28,252.4

Pollutant: ethyl acetate

TLV (mg/m3): 1440

Maximum Hourly Emission Rate (lbs/hr): 1.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 63.11

MAGLC (ug/m3): 34,285.7

Pollutant: n-butyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 3.84*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 201.94

MAGLC (ug/m3): 16,976.2

*Combined maximum emission rate for R001, R002, and R003.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the

application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

7. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and,
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the daily OC emissions exceeded 118.3 pounds per day, and the actual daily OC

emissions for each such day.

3. The deviation reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions.
4. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitations

the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour

Applicable Compliance Method

Compliance with the hourly and daily emission limitations shall be demonstrated based on daily record keeping requirements specified by section C.2 of these terms and conditions. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and photochemically reactive cleanup materials.

- b. Emission Limitation

118.3 pounds of OC per day for coatings

Applicable Compliance Method

Compliance with the daily emission limitation shall be demonstrated based on daily record keeping requirements specified in section C.3 of these terms and conditions. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings.

c. Emission Limitation

22.32 tons of OC per year for coatings and cleanup materials

Applicable Compliance Method

Compliance with the annual emission limitation shall be demonstrated based on monthly record keeping requirements specified in section C.4 of these terms and conditions. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and cleanup materials.

d. Emission Limitation

0.1 pound of PE per hour

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined using the following equation:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

$$E = \text{particulate emissions rate (pounds per hour)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = fractional control efficiency of the control equipment

e. Emission Limitation

0.44 ton of PE per year

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by multiplying the allowable hourly emission limitation by 8760 hours per year, then divide by 2000 pounds per ton.

f. Emission Limitation

Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average

Applicable Compliance Method

OAC rule 3745-17-03(B)(1)

F. Miscellaneous Requirements

None

Leider

PTI A

Issued: 7/27/2004

Emissions Unit ID: R003

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-11
R003 - Global Finishing Solutions Model Number Pyramid CF Spray Booth - Paint Spray Booth 2.	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
		OAC rule 3745-21-07(G)(4)
	OAC rule 3745-17-07(A)	

Applicable Emissions
Limitations/Control Measures

118.3 pounds of organic compounds (OC) per day for coatings

22.32 tons of OC per year for coatings and cleanup materials

0.1 pound of particulate emissions (PE) per hour

0.44 ton of PE per year

Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and OAC rule 3745-21-07(G)(4).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

When employing, applying, evaporating, or drying any photochemically reactive material, or substance containing such

photochemically reactive material, the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour.

Emissions of organic material to the atmosphere from the cleanup with photochemically reactive materials of any article, machine, equipment, or other contrivance, shall be included with the other emissions of organic materials from that article, machine, equipment, or other contrivance for determining compliance with OAC rule 3745-21-07(G)(2).

2. Additional Terms and Conditions

- 2.a** The hourly and annual PE emission limitations are based on the emissions unit's potential to emit. Therefore, no record keeping or reporting is required to demonstrate compliance with these limits.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the following information for the coating line:
 - a. the MSDS sheets for each coating and cleanup material currently employed;
 - b. documentation as to whether or not each coating and cleanup material is a photochemically reactive material, as applied; and,
 - c. when a new coating or cleanup material is going to be employed in the coating line, the permittee shall determine and document prior to employing the new coating or cleanup material whether or not it is a photochemically reactive material, as applied.
2. If it is determined that a photochemically reactive material is being employed in the coating line, the permittee shall collect and record the following information for each day for the coating line:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation of whether each coating or cleanup material employed is a photochemically reactive material, as applied;
 - c. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - d. the OC content of each coating and photochemically reactive cleanup material, as applied, in pounds per gallon;
 - e. for each day during which a photochemically reactive material is employed, the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

- f. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and,
- g. for each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, (i.e., (e)/(f)), in pounds per hour (average).

[Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

- 3. The permittee shall collect and record the following information for each day for the coating line:
 - a. the name and identification number of each coating and thinner employed;
 - b. the OC content of each coating and thinner, in pounds per gallon;
 - c. the number of gallons of each coating and thinner employed;
 - d. the total OC emissions from all coatings and thinners, in pounds per day (i.e., the sum of (b) times (c) for each coating and thinner).
- 4. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification of each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the total OC emissions from all cleanup materials, in tons per month (i.e., the sum of (b) times (c) for each cleanup material, then divided by 2000);
 - e. the total OC emissions from all coatings and thinners, in tons per month (i.e., the sum of the daily OC emissions in section C.3.d, then divided by 2000);
 - f. the total OC emissions from all coatings, thinners, and cleanup materials, in tons per month (i.e., (d) plus (e)).
- 5. The emissions unit shall be operated and maintained in accordance with manufacturer's

Emissions Unit ID: **R003**

recommendations. The emissions unit's exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

6. The permit to install for this emissions unit (R001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: ethanol

TLV (mg/m³): 1880

Maximum Hourly Emission Rate (lbs/hr): 0.81*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 42.49

MAGLC (ug/m³): 44,761.9

Pollutant: 1-butanol

TLV (mg/m³): 60.6

Maximum Hourly Emission Rate (lbs/hr): 1.25*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 65.77

MAGLC (ug/m³): 1442.9

Pollutant: acetone

TLV (mg/m³): 1186.6

Maximum Hourly Emission Rate (lbs/hr): 0.53*

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 27.91

MAGLC (ug/m3): 28,252.4

Pollutant: ethyl acetate

TLV (mg/m3): 1440

Maximum Hourly Emission Rate (lbs/hr): 1.2*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 63.11

MAGLC (ug/m3): 34,285.7

Pollutant: n-butyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 3.84*

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 201.94

MAGLC (ug/m3): 16,976.2

*Combined maximum emission rate for R001, R002, and R003.

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists

(ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- 7. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and,
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the

actual organic compound emissions for each such day.

2. The permittee shall submit deviation (excursion) reports which include an identification of each day during which the daily OC emissions exceeded 118.3 pounds per day, and the actual daily OC emissions for each such day.
3. The deviation reports shall be submitted in accordance with the requirements specified in the General Terms and Conditions.
4. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitations

the permittee shall not discharge more than 40 pounds of organic material into the atmosphere in any one day, nor more than 8 pounds of organic material in any one hour

Applicable Compliance Method

Compliance with the hourly and daily emission limitations shall be demonstrated based on daily record keeping requirements specified by section C.2 of these terms and conditions. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and photochemically reactive cleanup materials.

- b. Emission Limitation

118.3 pounds of OC per day for coatings

Applicable Compliance Method

Compliance with the daily emission limitation shall be demonstrated based on daily record keeping requirements specified in section C.3 of these terms and conditions. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings.

c. Emission Limitation

22.32 tons of OC per year for coatings and cleanup materials

Applicable Compliance Method

Compliance with the annual emission limitation shall be demonstrated based on monthly record keeping requirements specified in section C.4 of these terms and conditions. Formulation data or USEPA Method 24 (for coatings) or 24A (for flexographic and rotogravure printing inks and related coatings) shall be used to determine the organic compound contents of the coatings and cleanup materials.

d. Emission Limitation

0.1 pound of PE per hour

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined using the following equation:

$$E = \text{maximum coating solids usage rate in pounds per hour} \times (1-TE) \times (1-CE)$$

$$E = \text{particulate emissions rate (pounds per hour)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = fractional control efficiency of the control equipment

e. Emission Limitation

0.44 ton of PE per year

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by multiplying the allowable hourly emission limitation by 8760 hours per year, then divide by 2000 pounds per ton.

f. Emission Limitation

Visible particulate emissions from any stack shall not exceed five percent opacity, as a six-minute average

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Leider

PTI A

Issued: 7/27/2004

Emissions Unit ID: **R003**

Applicable Compliance Method

OAC rule 3745-17-03(B)(1)

F. Miscellaneous Requirements

None