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Facility Name: **Corwood Inc**
Application Number: **06-5635**
Date: **March 17, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

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

If the construction of the proposed source(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 Ohio Administrative Code (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

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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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Corwood Inc** located in **Tuscarawas** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>
R001	Flat line Overhead line with drying ovenwith drying
R002	oven
R002 Cont'd	
R003	
R003 Cont'd	

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Spray
booth

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
		Compliance with OAC 3745-21-07 (G) (2)		
	<u>BAT Determination</u>	Compliance with OAC 3745-21-07 (G) (2)		
	Minimize overspray; no photochemicall y reactive materials			

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal & OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
	Applicable Federal & OAC Rules	3745-21-07 (G)	3745-31-05	Permit Allowable Mass Emissions and/or Control/Usage Requirements
3745-31-05			3745-21-07 (G)	See Additional Special Terms and Conditions D and E
				Emissions of volatile organic compounds (OC) from R001 shall neither exceed 67.0 pounds per hour nor 50.0 tons per year.
3745-21-07				See Additional Special Terms and Conditions B and C
3745-17-07				See Additional Special Term and Condition A
3745-17-11	3745-17-07		3745-17-07	Emissions of particulate matter from each booth shall not exceed 0.551 pound per hour.
	3745-17-11		3745-17-11	
3745-31-05				See Additional

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Special Terms and Conditions D and E	hour nor 40 pounds per day. Emissions of OC shall not exceed 7.3 tons per year. See Additional Special Term and Condition C	day in which a photochemically reactive material is employed in this emissions unit, emissions of volatile organic compounds (OC) from R003 shall neither exceed 8 pounds per hour nor 40 pounds per day. Emissions of OC shall not exceed 7.3 tons per year.		
During any day in which a photochemical reactive material is employed in this emission unit, emissions of volatile organic compounds (OC) from R002 shall neither exceed 8 pounds per	See Additional Special Terms and Conditions D and E During any	Emissions of OC shall not exceed 7.3 tons per year. See Additional Term and Condition A Emissions of particulate matter from each booth shall not exceed 0.551 pound per hour. See Additional Special Terms and Conditions D and E		

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SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
OC	64.6

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be

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reported immediately to the **Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Visible Emission Limit

1. Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except for a period of 6 consecutive minutes in any 60 minutes. Visible particulate emissions shall not exceed 60 percent opacity, as a 6-minute average, at any time.

B. Coating Limit for the Flat Line

1. To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as coatings or cleanup materials) shall be employed in R001.

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

C. Clarification of Drying Ovens

1. The ovens associated with R001 and R002 are not subject to the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(1) because no baking or heat curing of the coatings occurs in the flashoff and drying oven.

D. Operational Restriction

1. The total quantity of OC applied (emitted) in R001, R002, and R003 shall not exceed 64.6 tons per rolling, 12-month period.

E. Compliance with the Air Toxics Policy

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 06-5635. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the xylene, ethanol, and butyl acetate emission limitations specified in this permit for combined emissions units R001, R002, and R003 were established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions units' exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN3 model and a comparison of the predicted 1-hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

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Pollutant: Xylene

TLV (ug/m3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 6.0
Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2292
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10333

Pollutant: Ethanol

TLV (ug/m3): 188,000
Maximum Hourly Emission Rate (lbs/hr): 58.96
Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 9640
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 44762

Pollutant: Butyl Acetate

TLV (ug/m3): 713,000
Maximum Hourly Emission Rate (lbs/hr): 1.7
Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2000
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16976

2. As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the Ohio EPA, Southeast District Office:
 - a. any changes in the composition of the coatings or solvents, or the use of new coatings or solvents, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. any change to the emissions unit or its exhaust parameters (e.g.,

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- increased emission rate, reduction of exhaust gas flow rate, and decreased stack height);
- c. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "OC" [OAC rule 3745-21-01(B)(6)]; and,
 - d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).
3. For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.

F. Monitoring and Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for R001, R002, and R003 separately:
 - a. the name and identification number of each coating, thinner, and cleanup material and a statement as to whether or not each is a "photochemically reactive material";
 - b. the OC content of each coating, thinner, and cleanup material, in pounds per gallon;
 - c. the number of gallons of each coating, thinner, and cleanup material employed;
 - d. the total OC emissions (OC applied) from all coatings, thinners, and cleanup materials employed [the sum of (F.1.b. times F.1.c.) for all coatings, thinners, and cleanup materials], in pounds or tons; and,
 - e. the rolling, 12-month summation of the total OC emissions for

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R001, R002, and R003 combined.

2. In addition, the permittee shall collect and record the following information each month for R002, and R003 separately:
 - a. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
 - b. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and,
 - c. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (F.2.a. divided by F.2.b.), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

3. 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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

G. Reporting Requirements

1. The permittee shall submit quarterly reports which include the total OC emissions from the coatings, thinners, and cleanup materials employed in R001, R002, and R003, in tons, for each calendar month. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include information for each month during the previous calendar quarter.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in R001. These reports shall be submitted within 30 days after the occurrence.

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3. The permittee shall submit deviation (excursion) reports for R002 and/or R003, within 30 days after the occurrence, 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,

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- 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.

H. Compliance Determinations

1. Compliance with the pounds OC per hour emission limit for R001 shall be demonstrated by multiplying the maximum number of gallons of coating that can theoretically be applied per hour (based on the maximum design capacities of the booths) times the highest OC content coating. No additional record keeping is necessary to demonstrate compliance with this limit because the limit cannot be exceeded under current conditions.
2. Compliance with the emission limitations of 8 pounds OC per hour and 40 pounds of OC per day for R002 and R003 shall be based upon the recordkeeping specified in F.2.c. and F.2.a. respectively.
3. Compliance with the air toxics requirements have been determined by modeling the maximum total combined emission rates for R001-R003 to determine the predicted 1-hour maximum ground-level concentration at the fenceline. Therefore, the hourly emission rates can not be exceeded under current conditions. As required above and by OAC rule 3745-31-02, any change in the coatings used or in the operation of the emissions units which would increase the emission rate of any individual air toxic would require a new permit to install.
4. Compliance with the rolling, 12-month emission limitations and usage restrictions above for OC shall be determined in accordance with the following method:

Formulation data or USEPA Method 24 shall be used to determine the OC content of the coatings, thinners, and cleanup materials. The OC emission rate and usage restrictions for each coating, thinner, and cleanup material shall be calculated by multiplying the volume of material employed by the appropriate OC content determined for that material. The OC emission rate and usage rate for each month shall be calculated by adding the emission rates and usage rates for all coatings, thinners, and cleanup materials employed during the month. The rolling, 12-month

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summations for total OC shall be calculated each month by adding the OC emission rate for that month to the OC emission rate for the

previous 11 calendar months (this same method shall be used to calculate rolling, 12-month usage).

5. Compliance with the visible particulate emission limit shall be determined in accordance with OAC rule 3745-17-03.
6. Compliance with the particulate matter emission limit of 0.551 pound per hour shall be determined based on emission testing conducted in accordance with OAC rule 3745-17-03. Emission testing is not specifically required to demonstrate compliance with this emission limit, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).
7. Compliance with the annual particulate matter emission limit shall be determined by multiplying the tested particulate matter emission rate, in pound(s) per hour, by the actual hours of operation per year.