



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

10/28/2016

Mr. Kim Root  
N. Wasserstrom & Sons/ Amtekco Industries Inc.  
2300 Lockbourne Road  
Columbus, OH 43207

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0125043113  
Permit Number: P0121770  
Permit Type: Administrative Modification  
County: Franklin

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA)Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. 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 PTI 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](http://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](http://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](http://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, Central District Office at (614)728-3778 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: U.S. EPA  
Ohio EPA-CDO



**FINAL**

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

for

**N. Wasserstrom & Sons/ Amtekco Industries Inc.**

Facility ID:	0125043113
Permit Number:	P0121770
Permit Type:	Administrative Modification
Issued:	10/28/2016
Effective:	10/28/2016





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
N. Wasserstrom & Sons/ Amtekco Industries Inc.

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**Final Permit-to-Install**  
N. Wasserstrom & Sons/ Amtekco Industries Inc.  
**Permit Number:** P0121770  
**Facility ID:** 0125043113  
**Effective Date:** 10/28/2016

## Authorization

Facility ID: 0125043113  
Facility Description: Restaurant furniture manufacturing  
Application Number(s): M0004212  
Permit Number: P0121770  
Permit Description: PTI administrative modification to remove language from K012-K030 that states that controls were considered while calculating potential to emit and addition of air toxics language to K011 and K012-K030.  
Permit Type: Administrative Modification  
Permit Fee: \$200.00  
Issue Date: 10/28/2016  
Effective Date: 10/28/2016

This document constitutes issuance to:

N. Wasserstrom & Sons/ Amtekco Industries Inc.  
1205 Refugee Road  
Columbus, OH 43207

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

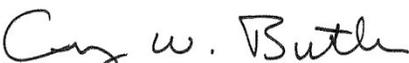
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

The above named entity is hereby granted a Permit-to-Install for the 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 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

  
Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0121770

Permit Description: PTI administrative modification to remove language from K012-K030 that states that controls were considered while calculating potential to emit and addition of air toxics language to K011 and K012-K030.

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

<b>Emissions Unit ID:</b>	<b>K011</b>
Company Equipment ID:	K011- Coating application booth 01 -formerly K001 and R002
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable

**Group Name: Amtekco Stations**

<b>Emissions Unit ID:</b>	<b>K012</b>
Company Equipment ID:	Furniture adhesive application AMT station 1
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K013</b>
Company Equipment ID:	Furniture adhesive application AMT station 2
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K014</b>
Company Equipment ID:	Furniture adhesive application AMT station 3
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K015</b>
Company Equipment ID:	Furniture adhesive application AMT station 4
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K016</b>
Company Equipment ID:	Furniture adhesive application AMT station 5
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K017</b>
Company Equipment ID:	Furniture adhesive application AMT station 6
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K018</b>
Company Equipment ID:	Furniture adhesive application AMT station 7
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K019</b>
Company Equipment ID:	Furniture adhesive application AMT station 8
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K020</b>
Company Equipment ID:	Furniture adhesive application AMT station 9
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable



<b>Emissions Unit ID:</b>	<b>K021</b>
Company Equipment ID:	Furniture adhesive application AMT station 10
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K022</b>
Company Equipment ID:	Furniture adhesive application AMT station 11
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K023</b>
Company Equipment ID:	Furniture adhesive application AMT station 12
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K024</b>
Company Equipment ID:	Furniture adhesive application AMT station 13
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K025</b>
Company Equipment ID:	Furniture adhesive application AMT station 14
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K026</b>
Company Equipment ID:	Furniture adhesive application AMT station 15
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K027</b>
Company Equipment ID:	Furniture adhesive application AMT station 16
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K028</b>
Company Equipment ID:	Furniture adhesive application AMT station 17
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K029</b>
Company Equipment ID:	Furniture adhesive application AMT station 18
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K030</b>
Company Equipment ID:	Furniture adhesive application AMT station 19
Superseded Permit Number:	P0116526
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install**  
N. Wasserstrom & Sons/ Amtekco Industries Inc.  
**Permit Number:** P0121770  
**Facility ID:** 0125043113  
**Effective Date:** 10/28/2016

## **A. Standard Terms and Conditions**

## **1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
- (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. General Requirements**

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.
- b) It shall not be a defense for the permittee in an enforcement action that it would have been

necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

**8. 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.

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.
- 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 state-only required 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 Ohio EPA DAPC, Central District Office. 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, 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.)

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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 permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## 12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

**13. Construction Compliance Certification**

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. 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.

**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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 by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



**Final Permit-to-Install**  
N. Wasserstrom & Sons/ Amtekco Industries Inc.  
**Permit Number:** P0121770  
**Facility ID:** 0125043113  
**Effective Date:**10/28/2016

## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. The following emissions units in this permit are subject to National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63, Subpart JJ, Maximum Achievable Control Standards (MACT): K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K025, K027, K028, K029, and K030. The complete NESHAP/MACT requirements, including the NESHAP/MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District Office or local air agency.
3. The following emissions units in this permit are subject to National Emissions Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63, Subpart RRRR, Maximum Achievable Control Standards (MACT): K003 and K011. The complete NESHAP/MACT requirements, including the NESHAP/MACT General Provisions, may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District Office or local air agency.



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## **C. Emissions Unit Terms and Conditions**



**1. K011, K011- Coating application booth 01 -formerly K001 and R002**

**Operations, Property and/or Equipment Description:**

Metal and wood furniture coating spray booth on Amtekco side - formerly K001

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)  (Synthetic Minor to Avoid Non-attainment New Source Review)	Volatile organic compound (VOC) emissions shall not exceed 25.41 tons per rolling, 12-month period.  See b)(2)a. below.
b.	40 CFR Part 63, Subpart JJ (40 CFR 63.800 - 808)	<u>See Table 3 of 40 CFR 63, Subpart JJ:</u> 1.0 lb volatile hazardous air pollutant (VHAP) per lb solids, as applied, for stains, washcoats, sealers, topcoats, basecoats, and enamels demonstrated in accordance with 63.804(a).  10% VHAP, by weight, for each thinner  See c)(3), c)(4), d)(8), e)(3), and f)(2) below.
c.	40 CFR Part 63, Subpart RRRR (40 CFR 63.4880 - 4981)	0.83 lb organic hazardous air pollutant (HAP) per gallon of coating solids demonstrated in accordance with 63.4891  See c)(5), d)(9), e)(4), and f)(3) below.
d.	40 CFR Part 63, Subpart A	See b)(2)f. and b)(2)g. below.
e.	OAC rule 3745-31-05(A)(3)  (P0116526)	Emissions of particulate matter less than 10 microns in aerodynamic diameter (PM <sub>10</sub> ) shall not exceed 1.67 tons per rolling, 12-month period.  Emissions of particulate matter less than 2.5 microns in aerodynamic diameter



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		(PM <sub>2.5</sub> ) shall not exceed 1.67 tons per rolling, 12-month period.  See b)(2)b. and b)(2)e. below.
f.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)c. below.
g.	ORC 3704.03(T)	The VOC emissions limitation established by this rule is equivalent to the VOC emissions limitation established pursuant to OAC rule 3745-31-05(D).
h.	OAC rule 3745-17-11(C)	See c)(1), c)(2), d)(3) – d)(7) and e)(2)d. below.
i.	OAC rule 3745-21-09(U)(2)(e)(iii)	Pursuant to OAC rule 3745-21-09(U)(2)(e)(iii), the limitations identified in OAC rule 3745-21-09(U)(1) do not apply to a coating line that never uses more than ten gallons per day of coating.  See b)(2)d. below.
j.	OAC rule 3745-114-01	See d)(10), d)(11), d)(12), d)(13), and e)(6) below.

(2) Additional Terms and Conditions

- a. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating and cleanup usage, upon issuance of this permit. The maximum coating and cleanup usage for this emissions unit shall not exceed:
  - i. 6,407 gallons of coating per rolling, 12-month period; and
  - ii. 1,095 gallons of cleanup material per rolling, 12-month period.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- c. The following rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
  - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM<sub>10</sub> and PM<sub>2.5</sub> emissions from this air contaminant source since the calculated annual emission rate for each pollutant is less than 10 tons/year, taking into account the federally enforceable rule under OAC rule 3745-17-11(C).
  - d. The permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.
  - e. The PM<sub>10</sub> and PM<sub>2.5</sub> emissions limitations were established to reflect the potential to emit for this emissions unit taking into consideration the use of the dry filtration system. The monitoring, recordkeeping, and reporting requirements associated with the dry filtration system are sufficient to ensure compliance with these limitations.
  - f. Table 1 to Subpart JJ of 40 CFR Part 63, *Applicability of General Provisions to Subpart JJ* identifies which parts of the General Provisions in 40 CFR 63.1-16 apply.
  - g. Table 2 to Subpart RRRR of 40 CFR Part 63, *Applicability of General Provisions to Subpart RRRR* identifies which parts of the General Provisions in 40 CFR 63.1-16 apply.
- c) Operational Restrictions
  - (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(A)(1), rule 17-11(C)(1) and rule 17-11(C)(2)(b)]
  - (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[Authority for term: OAC rule 3745-77-07(A)(1) and rule 17-11(C)(2)(e)]
  - (3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart JJ.



Applicable Rule	Requirement
63.802(a)	Emissions limitations for existing affected sources
63.802(c)	Operational and maintenance (general)

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart JJ]

- (4) The permittee shall comply with the applicable work practices standards required under 40 CFR Part 63, Subpart JJ, including the following sections:

Applicable Rule	Requirement
63.803(a)	Work implementation plan
63.803(b)	Operator training course*
63.803(c)	Inspection and maintenance plan
63.803(d)	Cleaning and wash-off solvent accounting system
63.803(e)	Chemical composition of cleaning and wash-off solvents
63.803(f)	Spray booth cleaning
63.803(g)	Storage requirements
63.803(h)	Application equipment requirements
63.803(i)	Line cleaning
63.803(j)	Gun cleaning
63.803(k)	Wash-off operations
63.803(l)	Formulation assessment plan for finishing operations

\* The permittee shall ensure that all personnel/positions associated with the coating operations utilizing HAP-containing materials receive training in the applicable 'work practice' standards required under 40 CFR 63 Subpart JJ (MACT Standards for Wood Furniture Manufacturing).

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart JJ]



- (5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart RRRR.

Applicable Rule	Requirement
63.4890	Emissions limitations for existing affected sources

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart RRRR]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records of the coating usage, in gallons, for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1), rule 21-09(B)(3)(d), and rule 21-09(U)(2)(e)(iii)]

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

- a. the name and identification number of each coating employed;
- b. the name and identification number of each cleanup material employed;
- c. the VOC content of each coating employed, in pounds per gallon;
- d. the VOC content of each cleanup material employed, in pounds per gallon;
- e. the number of gallons of each coating employed;
- f. the number of gallons of each cleanup material employed;
- g. the rolling, 12-month total of all coatings employed, in gallons;
- h. the rolling, 12-month total of all cleanup materials employed, in gallons;
- i. the total monthly VOC emissions from coatings employed [e.g., the sum of (2)e. multiplied by (2)c. for all coatings];
- j. the total monthly VOC emissions from cleanup materials employed [e.g., the sum of (2)f. multiplied by (2)d. for all cleanup materials];
- k. the combined monthly VOC emissions from coating and cleanup operations, in tons [e.g., the sum of (2)i. and (2)j]; and
- l. the combined, rolling, 12-month VOC emissions from coating and cleanup operations [e.g., the result of (2)k. added to the previous 11 months].

[Authority for term: OAC rule 3745-77-07(C)(1) and rule 31-05(D)]

- (3) 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 Ohio EPA Central District Office upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and rule 17-11(C)(2)(a)]

- (4) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and rule 17-11(C)(2)(c)]

- (5) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and rule 17-11(C)(2)(c)]

- (6) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- the date of the inspection;
  - a description of each/any problem identified and the date it was corrected;
  - a description of any maintenance and repairs performed; and
  - the name of 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 Ohio EPA Central District Office upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and rules 17-11(C)(2)(d) and (f)]

- (7) 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and rules 17-11(C)(2)(e), (f), and (g)]

- (8) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart JJ., including the following:

Applicable Rule	Requirement
63.806(a)	Recordkeeping requirements of 63.10 of Subpart A according to the applicability criteria in 63.800(d).
63.806(b)	Recordkeeping requirements for sources subject to emission limitations in 63.802.
63.806(e)	Recordkeeping requirements for the work practice standards in 63.803.
63.806(h)	Recordkeeping requirements for the compliance certifications submitted in accordance with 63.807(c) for sources subject to the emission limitations in 63.802 and following the compliance provisions of 63.804(f)(1), (2), (3), (5), (7) and (8) and 63.804(g)(1), (2), (3), (5), (7) and (8).
63.806(i)	Recordkeeping requirements of all other information submitted with the compliance status report required by 63.9(h) and 63.807(b).
63.806(j)	Recordkeeping requirements in accordance with 63.10(b)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJ]

- (9) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart RRRR.

Applicable Rule	Requirement
40 CFR 63.4930(b)	Copy of current supplier's specification, formulation data and test method results
40 CFR 63.4930(c)(1)	Operation and usage data
40 CFR 63.4930(c)(2) and 40 CFR 63.4941(d)	Calculation of the organic HAP content for each coating, using Equation 2 of 63.4941
40 CFR 63.4930(d)	Record of name and volume of each coating, thinner, and cleaning material used during each compliance period
40 CFR 63.4930(e) and 63.4941(a)(4)-	Records of the mass fraction of organic

Applicable Rule	Requirement
(5)	HAP for each coating, thinner and cleaning material used during each compliance period
40 CFR 63.4930(f) and 63.4941(b)	Records of the volume fraction of coating solids for each coating used during each compliance period
40 CFR 63.4930(g) and 63.4941(c)	Records of the density of each coating used during each compliance period
40 CFR 63.4930(j) and 63.4920(a) – (c)	Continuing recordkeeping for each monthly compliance period as demonstrated above
40 CFR 63.4931	Records retention for at least 5 years, and a minimum of 2 years on site

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart RRRR]

- (10) The permit-to-install (PTI) application for this emissions unit, K011, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emission units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
    - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
    - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold

Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., “24” hours per day and “7” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- 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/m<sup>3</sup>): 75

Maximum Hourly Emission Rate (lbs/hr): 1.52

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 41.71

MAGLC (ug/m<sup>3</sup>): 1,758.7

The permittee, has demonstrated that emissions of toluene, from emissions unit K011, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (11) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (12) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (13) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

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.

[Authority for term: OAC rule 3745-77-07(A)(3)(c) and rule 15-03(A)]

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

- a. any exceedance of the rolling, 12-month summation of coating;
- b. any exceedance of the rolling, 12-month summation of cleanup material;
- c. any exceedance of the rolling, 12-month VOC emissions limitation; and
- d. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(A)(3)(c), rule 15-03(B)(1)(a), and rule 15-03(C)]

- (3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR, Part 63, Subpart JJ, including the following sections:

Applicable Rule	Requirement
63.807(a)	Reporting requirements of 63.7 through 63.10 of Subpart A according to the applicability criteria in 63.800(d)
63.807(b)	Reporting requirements for sources demonstrating compliance in accordance with 63.804(f)(1), (2), (3), (5), (7) and (8)
63.807(c)	Reporting requirements for sources demonstrating compliance



Applicable Rule	Requirement
	in accordance with 63.804(g)(1), (2), (3), (5), (7) and (8)
63.807(e)	Reporting requirements for sources required to provide a written notification under 63.803(l)(4)

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJ]

- (4) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR, Part 63, Subpart RRRR, including the following sections:

Applicable Rule	Requirement
40 CFR 63.4910	Submit all reports that apply by required dates in Table 2, General Provisions
40 CFR 63.4920(a)(1), (a)(2), and (a)(3)(i) - (iv) and (a)(4) - (5)	Submit the semiannual compliance report.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart RRRR]

- (5) The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the coating line employed more than 10 gallons per day. The notification shall include a copy of such record and shall be sent to the appropriate District Office or local air agency within 45 days after the exceedance occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and rule 21-09(B)(3)(e)]

- (6) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], and Option A, Engineering Guide #70

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. Emissions Limitation:

VOC emissions shall not exceed 25.41 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements established in d)(2).

b. Emissions Limitations:

PM<sub>10</sub> emissions shall not exceed 1.67 tons per rolling, 12-month period (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

PM<sub>2.5</sub> emissions shall not exceed 1.67 tons per rolling, 12-month period (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The rolling, 12-month PM<sub>10</sub> and PM<sub>2.5</sub> emissions limitations were established by multiplying the maximum hourly coating usage (0.73 gallons) by the maximum solids content in the coatings and a conversion factor of 8,760 hours/yr and 1 ton/2000 lbs. Multiply the result by one minus the transfer efficiency (65%) and one minus the control efficiency (88%).

c. Emissions Limitation:

Use no more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements established in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1), rule 31-05(D), rule 31-05(A)(3), and rule 21-09(U)(2)(e)(iii)]

- (2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart JJ.

Applicable Rule	Requirement
63.804(a)	An affected source subject to 63.802(a)(1) shall comply with those provisions by using any of the methods presented in 63.804(a)(1) through (a)(4).
63.804(f)	Initial compliance.



Applicable Rule	Requirement
63.804(g)	Continuous compliance demonstrations.
63.805(a)	U.S. EPA Method 311 of Appendix A of 40 CFR, Part 63 shall be used in conjunction with the formulation data to determine the VHAP (or formaldehyde specifically) content of the liquid coating.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJ]

- (3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart RRRR.

Applicable Rule	Requirement
40 CFR 63.4940, 63.4941, and 63.4942	The permittee must continue to perform ongoing compliance demonstrations according to the requirements in 63.4942.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart RRRR]

g) Miscellaneous Requirements

- (1) None.



**2. Emissions Unit Group -Amtekco Stations:  
 K012,K013,K014,K015,K016,K017,K018,K019,K020,K021,K022,K023,K024,K025,K026,K027,K028,  
 K029,K030,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K012	AMT air spray gun for wood furniture adhesive application, station #1 - formerly R001
K013	AMT air spray gun for wood furniture adhesive application, station #2
K014	AMT air spray gun for wood furniture adhesive application, station #3
K015	AMT air spray gun for wood furniture adhesive application, station #4
K016	AMT air spray gun for wood furniture adhesive application, station #5
K017	AMT air spray gun for wood furniture adhesive application, station #6
K018	AMT air spray gun for wood furniture adhesive application, station #7
K019	AMT air spray gun for wood furniture adhesive application, station #8
K020	AMT air spray gun for wood furniture adhesive application, station #9
K021	AMT air spray gun for wood furniture adhesive application, station #10
K022	AMT air spray gun for wood furniture adhesive application, station #11
K023	AMT air spray gun for wood furniture adhesive application, station #12
K024	AMT air spray gun for wood furniture adhesive application, station #13
K025	AMT air spray gun for wood furniture adhesive application, station #14
K026	AMT air spray gun for wood furniture adhesive application, station #15
K027	AMT air spray gun for wood furniture adhesive application, station #16
K028	AMT air spray gun for wood furniture adhesive application, station #17
K029	AMT air spray gun for wood furniture adhesive application, station #18
K030	AMT air spray gun for wood furniture adhesive application, station #19

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)  (Synthetic Minor to Avoid Non-attainment New Source Review)	Volatile organic compound (VOC) emissions shall not exceed 2.10 tons per rolling, 12-month period.  See b)(2)a. below.
b.	40 CFR Part 63, Subpart JJ (40 CFR 63.800 - 808)	<u>See Table 3 of 40 CFR 63, Subpart JJ:</u> 1.0 lb volatile hazardous air pollutant (VHAP) per lb solids, as applied, for



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		stains, washcoats, sealers, topcoats, basecoats, and enamels demonstrated in accordance with 63.804(a).  10% VHAP, by weight, for each thinner  See c)(1), c)(2), d)(3), e)(3), and f)(2) below.
c.	40 CFR Part 63, Subpart A	See b)(2)f. below.
d.	OAC rule 3745-31-05(A)(3)  (P0116526)	Emissions of particulate matter less than 10 microns in aerodynamic diameter (PM <sub>10</sub> ) shall not exceed 0.15 ton per rolling, 12-month period.  Emissions of particulate matter less than 2.5 microns in aerodynamic diameter (PM <sub>2.5</sub> ) shall not exceed 0.15 ton per rolling, 12-month period.  The VOC emissions limitation established by this rule is equivalent to the VOC emissions limitation established pursuant to OAC rule 3745-31-05(D).  See b)(2)b. and b)(2)e. below.
e.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)c. below.
f.	OAC rule 3745-17-11(C)	This emissions unit is exempt from the requirements of OAC rule 3745-17-11(C) pursuant to OAC rule 3745-17-11(A)(1)(i).  See b)(2)d. below.
g.	OAC rule 3745-114-01	See d)(4), d)(5), d)(6), d)(7), and e)(4) below.

(2) Additional Terms and Conditions

- a. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the adhesive and cleanup usage, upon issuance of this permit. The maximum adhesive and cleanup usage for this emissions unit shall not exceed:
  - i. 673 gallons of adhesive per rolling, 12-month period; and
  - ii. 82 gallons of cleanup material per rolling, 12-month period.

- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
  - c. The following rule paragraphs apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
    - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM<sub>10</sub> and PM<sub>2.5</sub> emissions from this air contaminant source since the calculated annual emission rate for each pollutant is less than 10 tons/year, taking into account the federally enforceable rule under OAC rule 3745-17-11(C); and
    - ii. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate for VOC is less than 10 tons/year, taking into account the federally enforceable limitations established under OAC rule 3745-31-05(D);
  - d. The maximum daily adhesive usage for this emissions unit shall not exceed 5 gallons.
  - e. The hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. The monitoring, recordkeeping, and reporting requirements are sufficient to ensure compliance with these limitations.
  - f. Table 1 to Subpart JJ of 40 CFR Part 63, *Applicability of General Provisions to Subpart JJ* identifies which parts of the General Provisions in 40 CFR 63.1-16 apply.
- c) Operational Restrictions
- (1) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart JJ.

Applicable Rule	Requirement
63.802(a)	Emissions limitations for existing affected sources
63.802(c)	Operational and maintenance (general)

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart JJ]

- (2) The permittee shall comply with the applicable work practices standards required under 40 CFR Part 63, Subpart JJ, including the following sections:

Applicable Rule	Requirement
63.803(a)	Work implementation plan
63.803(b)	Operator training course*
63.803(c)	Inspection and maintenance plan
63.803(d)	Cleaning and wash-off solvent accounting system
63.803(e)	Chemical composition of cleaning and wash-off solvents
63.803(f)	Spray booth cleaning
63.803(g)	Storage requirements
63.803(h)	Application equipment requirements
63.803(i)	Line cleaning
63.803(j)	Gun cleaning
63.803(k)	Wash-off operations
63.803(l)	Formulation assessment plan for finishing operations

\* The permittee shall ensure that all personnel /positions associated with the adhesive operations utilizing HAP-containing materials receive training in the applicable 'work practice' standards required under 40 CFR 63 Subpart JJ (MACT Standards for Wood Furniture Manufacturing).

[Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart JJ]



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records of the adhesive usage, in gallons, for this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1), and rule 17-11(A)(1)(i)]

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

- a. the name and identification number of each adhesive employed;
- b. the name and identification number of each cleanup material employed;
- c. the VOC content of each adhesive employed, in pounds per gallon;
- d. the VOC content of each cleanup material employed, in pounds per gallon;
- e. the number of gallons of each adhesive employed;
- f. the number of gallons of each cleanup material employed;
- g. the rolling, 12-month total of all adhesive employed, in gallons;
- h. the rolling, 12-month total of all cleanup materials employed, in gallons;
- i. the total monthly VOC emissions from adhesives employed [e.g., the sum of (2)e. multiplied by (2)c. for all adhesives];
- j. the total monthly VOC emissions from cleanup materials employed [e.g., the sum of (2)f. multiplied by (2)d. for all cleanup materials];
- k. the combined monthly VOC emissions from adhesive and cleanup operations, in tons [e.g., the sum of (2)i. and (2)j]; and
- l. the combined, rolling, 12-month VOC emissions from adhesive and cleanup operations [e.g., the result of (2)k. added to the previous 11 months].

[Authority for term: OAC rule 3745-77-07(C)(1) and rule 31-05(D)]

- (3) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart JJ.

Applicable Rule	Requirement
63.806(a)	Recordkeeping requirements of 63.10 of Subpart A according to the applicability criteria in 63.800(d).
63.806(b)	Recordkeeping requirements for sources



	subject to emission limitations in 63.802.
63.806(e)	Recordkeeping requirements for the work practice standards in 63.803.
63.806(h)	Recordkeeping requirements for the compliance certifications submitted in accordance with 63.807(c) for sources subject to the emission limitations in 63.802 and following the compliance provisions of 63.804(f)(1), (2), (3), (5), (7) and (8) and 63.804(g)(1), (2), (3), (5), (7) and (8).
63.806(i)	Recordkeeping requirements of all other information submitted with the compliance status report required by 63.9(h) and 63.807(b).
63.806(j)	Recordkeeping requirements in accordance with 63.10(b)(1).

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJ]

- (4) The permit-to-install (PTI) application for these emissions units, K012-K030, were evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emission units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
    - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Toxic Contaminant: toluene

TLV (mg/m<sup>3</sup>): 75

Maximum Hourly Emission Rate (lbs/hr): 4.18

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 735.6

MAGLC (ug/m<sup>3</sup>): 1,758.7

The permittee, has demonstrated that emissions of toluene, from emissions units K012-K030, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (5) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
  - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

- (7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], Option A, Engineering Guide #70

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.

[Authority for term: OAC rule 3745-77-07(A)(3)(c) and rule 15-03(A)]

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

- a. any exceedance of the daily adhesive usage limitation;
- b. any exceedance of the rolling, 12-month summation of adhesive;
- c. any exceedance of the rolling, 12-month summation of cleanup material; and
- d. any exceedance of the rolling, 12-month VOC emissions limitation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: OAC rule 3745-77-07(A)(3)(c), rule 15-03(B)(1)(a), and rule 15-03(C)]

- (3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR, Part 63, Subpart JJ, including the following sections:

Applicable Rule	Requirement
63.807(a)	Reporting requirements of 63.7 through 63.10 of Subpart A according to the applicability criteria in 63.800(d).
63.807(b)	Reporting requirements for sources demonstrating compliance in accordance with 63.804(f)(1), (2), (3), (5), (7) and (8).
63.807(c)	Reporting requirements for sources demonstrating compliance in accordance with 63.804(g)(1), (2), (3), (5), (7) and (8).



63.807(e)	Reporting requirements for sources required to provide a written notification under 63.803(l)(4).
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[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJ]

- (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 ground-level 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.

[ORC 3704.03(F)(3)(c) and F(4)], [OAC rule 3745-114-01], and Option A, Engineering Guide #70

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 emissions shall not exceed 2.10 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the recordkeeping requirements established in d)(2).

b. Emissions Limitations:

PM<sub>10</sub> emissions shall not exceed 0.15 tons per rolling, 12-month period (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

PM<sub>2.5</sub> emissions shall not exceed 0.15 tons per rolling, 12-month period (as applicable prior to U.S. EPA approving the December 1, 2006, version of OAC rule 3745-31-05 as part of the SIP).

Applicable Compliance Method:

The rolling, 12-month PM<sub>10</sub> and PM<sub>2.5</sub> emissions limitations were established by multiplying the adhesive density and the solids weight percent of the adhesive by the maximum adhesive usage per year. The resulting emission limitation was then multiplied by one minus a transfer efficiency of 65% and a conversion factor of 1 ton/2000 lbs.



c. Emissions Limitation:

Use no more than 5 gallons of adhesive material per day.

Applicable Compliance Method:

Compliance shall demonstrated in accordance with the recordkeeping requirements established in d)(1).

[Authority for term: OAC rule 3745-77-07(C)(1), rule 31-05(D), rule 31-05(A)(3), and rule 17-11(A)(1)(i)]

- (2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart JJ.

Applicable Rule	Requirement
63.804(a)	An affected source subject to 63.802(a)(1) shall comply with those provisions by using any of the methods presented in 63.804(a)(1) through (a)(4).
63.804(f)	Initial compliance.
63.804(g)	Continuous compliance demonstrations.
63.805(a)	U.S. EPA Method 311 of Appendix A of 40 CFR, Part 63 shall be used in conjunction with the formulation data to determine the VHAP (or formaldehyde specifically) content of the liquid coating.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJ]

g) Miscellaneous Requirements

- (1) None.