Facility ID: 1576001885 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

Go to Part II for Emissions Unit K001
Go to Part II for Emissions Unit K002
Go to Part II for Emissions Unit K003
Go to Part II for Emissions Unit P901



**Facility ID: 1576001885 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| K001 - Wood finish spray booth: Finishing Line #1 | OAC rule 3745-31-05(A)(3) | The volatile organic compound (VOC) emissions shall not exceed 4.43 lbs/hr and 19.4 tons/yr.<br><br>The organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day (during any day in which photochemically reactive materials are employed).<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-21-07(G)(2).<br><br>See sections A.2.a and A.2.b below. |
| | OAC rule 3745-17-07(A)(1) | Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule. |
| | OAC rule 3745-35-07(D) | See sections A.2.c and A.2.d below. |
| | OAC rule 3745-21-07(G)(2) | See section A.2.e. below. |

2. **Additional Terms and Conditions**

   (a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and compliance with the Air Toxics Policy.
   The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
   The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility (K001, K002 and K003), as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs. Historical reports, submitted by the permittee since January of 2000, have shown that this facility is in compliance with these limits.
   The combined annual VOC emissions from the entire facility (K001, K002 and K003) shall not exceed 85.44 tons/year, based upon a rolling, 12-month summation of the monthly emissions. In order to make this limit federally enforceable, the permittee is accepting the following limits: 1) the maximum VOC content of any coating employed shall not exceed 7 lbs/gallon; 2) the maximum VOC content of any cleanup material employed shall not exceed 8 lbs/gallon; 3) the maximum annual combined coating usage for the entire facility (K001, K002 and K003) shall not exceed 24,000 gallons/yr, based upon a rolling, 12-month summation of the coating usage figures; and 4) the maximum annual combined cleanup material usage for the entire facility (K001, K002 and K003) shall not exceed 360 gallons/yr, based upon a rolling, 12-month summation of the cleanup material usage figures. Historical reports, submitted by the permittee since January of 2000, have shown that this facility is in compliance with these limits.
   Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Canton local air agency. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials

will comply with the emission limits and/or control requirements as defined in OAC rule 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

B. **Operational Restrictions**

1. The stack(s) servicing this emissions unit shall be unobstructed.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:

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

b. an identification as to whether any coatings or cleanup material employed are photochemically reactive materials;

c. the number of gallons of each coating and cleanup material employed;

d. the OC and VOC content of each coating and cleanup material, in pounds per gallon;

e. the daily OC and VOC emissions from the usage of coatings and cleanup material;

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

g. the average hourly OC and VOC emission rate for all coatings and cleanup materials, in pounds per hour (average);

h. the total OC emissions rate for all coatings and photochemically reactive cleanup materials, for each day during which a photochemically reactive material is employed, in pounds per day; and

i. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, for each day during which a photochemically reactive material is employed, i. e. (h)/(f), 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.]

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002 and K003:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material, as applied;

c. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all of the individual HAP contents from (c)];

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all of the individual HAP contents from (g)];

i. the number of gallons of each cleanup material employed;

j. the total individual HAP emissions, in tons per month;

k. the total combined HAPs emissions, in tons per month;

l. the total VOC emissions, in tons per month;

m. the rolling, 12-month summations of the total coating usage, in gallons per year (the sum of (e) for the previous 12 calendar months);

n. the rolling, 12-month summations of the total cleanup material usage, in gallons per year (the sum of (i) for the previous 12 calendar months);

o. the rolling, 12-month summations of the monthly emissions of each individual HAP, (the sum of (j) for the previous 12 calendar months);
p. the rolling, 12-month summations of the monthly emissions of the total combined HAPs, (the sum of (k) for the previous 12 calendar months); and

q. the rolling, 12-month summations of the monthly emissions of VOC (the sum of (l) for the previous 12 calendar months).

3. The permit to install for these emissions units (K001, K002 and K003) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New

Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Dibutyl Phthalate

TLV (ug/m3): 5,000

Maximum Hourly Emission Rate (lbs/hr): 1.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 114

MAGLC (ug/m3): 119

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:
a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

4. If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:

a. the rolling, 12-month facility-wide limitations on coating and cleanup material usage;

b. an identification of each day during which the average hourly VOC emissions exceeded 4.43 lbs/hr and the actual average hourly VOC emissions for each such day;

c. 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;

d. for the days during which a photochemically reactive material was employed, an identification of each such 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;

e. an identification of each month in which a coating with a VOC content of more than 7 lbs/gallon was employed and the quantity of such coating employed that month;

f. an identification of each month in which a cleanup material with a VOC content of more than 8 lbs/gallon was employed and the quantity of such cleanup material employed that month;

g. the rolling, 12-month facility-wide limitations on the total individual HAP emissions for each HAP from all coatings and cleanup materials employed in emissions units K001, K002 and K003, in pounds or tons per month;

h. the rolling, 12-month facility-wide limitations on the total combined HAP emissions from all coatings and cleanup materials employed in emissions units K001, K002 and K003, in pounds or tons per month; and
i. the rolling, 12-month facility-wide limitations on the total VOC emissions from all coatings and cleanup materials employed in emissions units K001, K002 and K003, in pounds or tons per month.

These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under

section (A)(1).

2. The permittee shall submit annual reports to the Canton local air agency which summarize the following for emissions units K001, K002 and K003:

a. the total VOC emissions from coatings and cleanup materials employed in these emissions unit for the previous calendar year;

b. the total number of gallons of coatings employed in these emissions units for the previous calendar year;

c. the total number of gallons of cleanup materials employed in these emissions units for the previous calendar year;

d. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed in emissions units K001, K002 and K003, in pounds or tons; and

e. the total combined HAPs emissions from all coatings and cleanup materials employed in emissions units K001, K002 and K003, in pounds or tons.

These reports shall be submitted by January 31 of each year.

E. **Testing Requirements**

1. Compliance with the emissions limitations in section II.A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitation:
85.44 tons per year of VOC based upon a rolling, 12-month summation of the monthly emissions from the entire facility.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping as specified in section C.2.q.
Emissions Limitation:
4.43 lbs/hr of VOC
19.4 tons/yr of VOC
8.0 lbs/hr of OC
40 lbs/day of OC
(during any day in which photochemically reactive materials are employed)

Applicable Compliance Method:
Daily records shall be maintained of the VOC content of each coating and cleanup material employed, the daily usage of each coating and cleanup material employed, and the calculated hourly VOC emission rate for all coatings and cleanup materials employed. Compliance with the daily VOC emissions limitation shall be demonstrated by the record keeping requirement in section C.1. of these terms and conditions. USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
Emissions Limitation:
Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
OAC rule 3745-17-03 (B)(1)
Emissions Limitation:
9.9 tons/yr of individual HAP per rolling, 12-month period

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping as specified in section C.2.o.
Emissions Limitation:
24.9 tons/yr of total combined HAPs per rolling, 12-month period

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping as specified in section C.2.p.

2. Compliance with the usage restrictions and operational limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:
Operational Limitation:
The maximum annual combined coating usage for the entire facility (K001, K002 and K003) shall not exceed 24,000 gallons of coating per year, based upon a rolling, 12-month summation of the coating usage figures.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section C.2.m.
Operational Limitation:
The maximum annual combined cleanup material usage for the entire facility (K001, K002 and K003) shall not exceed 360 gallons/yr, based upon a rolling, 12-month summation of the cleanup material usage figures.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section C.2.n.
Operational Limitation:
The maximum VOC content of any coating employed shall not exceed 7 lbs/gallon.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section C.1.d.

Operational Limitation:
The maximum VOC content of any cleanup material employed shall not exceed 8 lbs/gallon.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section C.1.d.

F. **Miscellaneous Requirements**

1. None



**Facility ID: 1576001885 Emissions Unit ID: K002 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| K002 - Wood finish spray booth with infrared drying oven: Finishing Line #2 | OAC rule 3745-31-05(A)(3) | The volatile organic compound (VOC) emissions shall not exceed 36.43 lbs/hr and 85.44 tons/yr.<br><br>The organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day (during any day in which photochemically reactive materials are employed).<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-21-07(G)(2).<br><br>See sections A.2.a and A.2.b below. |
| | OAC rule 3745-17-07(A)(1) | Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule. |
| | OAC rule 3745-35-07(D) | See sections A.2.c and A.2.d below. |
| | OAC rule 3745-21-07(G)(2) | See section A.2.e. below. |

2. **Additional Terms and Conditions**

(a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and compliance with the Air Toxics Policy.
The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility (K001, K002 and K003), as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs. Historical reports, submitted by the permittee since January of 2000, have shown that this facility is in compliance with these limits.
The combined annual VOC emissions from the entire facility (K001, K002 and K003) shall not exceed 85.44 tons/year, based upon a rolling, 12-month summation of the monthly emissions. In order to make this limit federally enforceable, the permittee is accepting the following limits: 1) the maximum VOC content of any coating employed shall not exceed 7 lbs/gallon; 2) the maximum VOC content of any cleanup material employed shall not exceed 8 lbs/gallon; 3) the maximum annual combined coating usage for the entire facility (K001, K002 and K003) shall not exceed 24,000 gallons/yr, based upon a rolling, 12-month summation of the coating usage figures; and 4) the maximum annual combined cleanup material usage for the entire facility (K001, K002 and K003) shall not exceed 360 gallons/yr, based upon a rolling, 12-month summation of the cleanup material usage figures. Historical reports, submitted by the permittee since January of 2000, have shown that this facility is in compliance with these limits.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Canton local air agency. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC rule 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

B. **Operational Restrictions**

1. The stack(s) servicing this emissions unit shall be unobstructed.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:

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

b. an identification as to whether any coatings or cleanup material employed are photochemically reactive materials;

c. the number of gallons of each coating and cleanup material employed;

d. the OC and VOC content of each coating and cleanup material, in pounds per gallon;

e. the daily OC and VOC emissions from the usage of coatings and cleanup material;

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

g. the average hourly OC and VOC emission rate for all coatings and cleanup materials, in pounds per hour (average);

h. the total OC emissions rate for all coatings and photochemically reactive cleanup materials, for each day during which a photochemically reactive material is employed, in pounds per day; and

i. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, for each day during which a photochemically reactive material is employed, i. e. (h)/(f), 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.]

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002 and K003:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material, as applied;

c. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all of the individual HAP contents from (c)];

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all of the individual HAP contents from (g)];

i. the number of gallons of each cleanup material employed;

j. the total individual HAP emissions, in tons per month;

k. the total combined HAPs emissions, in tons per month;

l. the total VOC emissions, in tons per month;

m. the rolling, 12-month summations of the total coating usage, in gallons per year (the sum of (e) for the previous 12 calendar months);

n. the rolling, 12-month summations of the total cleanup material usage, in gallons per year (the sum of (i) for the previous 12 calendar months);

o. the rolling, 12-month summations of the monthly emissions of each individual HAP, (the sum of (j) for the previous 12 calendar months);
p. the rolling, 12-month summations of the monthly emissions of the total combined HAPs, (the sum of (k) for the previous 12 calendar months); and

q. the rolling, 12-month summations of the monthly emissions of VOC (the sum of (l) for the previous 12 calendar months).

3. The permit to install for these emissions units (K001, K002 and K003) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

   The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: Dibutyl Phthalate

   TLV (ug/m3): 5,000

   Maximum Hourly Emission Rate (lbs/hr): 1.23

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 114

   MAGLC (ug/m3): 119

   Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:
   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

4. If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

   The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. when the computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:

   a. the rolling, 12-month facility-wide limitations on coating and cleanup material usage;

   b. an identification of each day during which the average hourly VOC emissions exceeded 4.43 lbs/hr and the actual average hourly VOC emissions for each such day;

   c. 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;

   d. for the days during which a photochemically reactive material was employed, an identification of each such 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;

   e. an identification of each month in which a coating with a VOC content of more than 7 lbs/gallon was employed and the quantity of such coating employed that month;

   f. an identification of each month in which a cleanup material with a VOC content of more than 8 lbs/gallon was employed and the quantity of such cleanup material employed that month;

   g. the rolling, 12-month facility-wide limitations on the total individual HAP emissions for each HAP from all coatings and cleanup materials employed in emissions units K001, K002 and K003, in pounds or tons per month;

   h. the rolling, 12-month facility-wide limitations on the total combined HAP emissions from all coatings and cleanup materials employed in emissions units K001, K002 and K003, in pounds or tons per month; and
   i. the rolling, 12-month facility-wide limitations on the total VOC emissions from all coatings and cleanup

materials employed in emissions units K001, K002 and K003, in pounds or tons per month.

These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

2. The permittee shall submit annual reports to the Canton local air agency which summarize the following for emissions units K001, K002 and K003:

a. the total VOC emissions from coatings and cleanup materials employed in these emissions unit for the previous calendar year;

b. the total number of gallons of coatings employed in these emissions units for the previous calendar year;

c. the total number of gallons of cleanup materials employed in these emissions units for the previous calendar year;

d. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed in emissions units K001, K002 and K003, in pounds or tons; and

e. the total combined HAPs emissions from all coatings and cleanup materials employed in emissions units K001, K002 and K003, in pounds or tons.

These reports shall be submitted by January 31 of each year.

E. **Testing Requirements**

1. Compliance with the emissions limitations in section II.A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitation:
85.44 tons per year of VOC based upon a rolling, 12-month summation of the monthly emissions from the entire facility

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping as specified in section C.2.q.
Emissions Limitation:
36.43 lbs/hr of VOC
85.44 tons/yr of VOC
8.0 lbs/hr of OC
40 lbs/day of OC
(during any day in which photochemically reactive materials are employed)

Applicable Compliance Method:
Daily records shall be maintained of the VOC content of each coating and cleanup material employed, the daily usage of each coating and cleanup material employed, and the calculated hourly VOC emission rate for all coatings and cleanup materials employed. Compliance with the daily VOC emissions limitation shall be demonstrated by the record keeping requirement in section C.1. of these terms and conditions. USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
Emissions Limitation:
Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
OAC rule 3745-17-03 (B)(1)
Emissions Limitation:
9.9 tons/yr of individual HAP per rolling, 12-month period

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping as specified in section C.2.o.
Emissions Limitation:
24.9 tons/yr of total combined HAPs per rolling, 12-month period

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping as specified in section C.2.p.

2. Compliance with the usage restrictions and operational limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:
Operational Limitation:
The maximum annual combined coating usage for the entire facility (K001, K002 and K003) shall not exceed 24,000 gallons of coating per year, based upon a rolling, 12-month summation of the coating usage figures.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section C.2.m.
Operational Limitation:
The maximum annual combined cleanup material usage for the entire facility (K001, K002 and K003) shall not exceed 360 gallons/yr, based upon a rolling, 12-month summation of the cleanup material usage figures.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section C.2.n.
Operational Limitation:
The maximum VOC content of any coating employed shall not exceed 7 lbs/gallon.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section C.1.d.
Operational Limitation:
The maximum VOC content of any cleanup material employed shall not exceed 8 lbs/gallon.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section C.1.d.

F. **Miscellaneous Requirements**

1. None



**Facility ID: 1576001885 Emissions Unit ID: K003 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| K003 - Coating of wood products using a dip tank<br>Tank #1 Dip Line | OAC rule 3745-31-05(A)(3) | The volatile organic compound (VOC) emissions shall not exceed 20 lbs/day and 3.65 tons/yr.<br><br>The organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day (during any day in which photochemically reactive materials are employed).<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-21-07(G)(2).<br><br>See sections A.2.a and A.2.b below. |
| | OAC rule 3745-17-07(A)(1) | Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule. |
| | OAC rule 3745-35-07(D) | See sections A.2.c and A.2.d below. |
| | OAC rule 3745-21-07(G)(2) | See section A.2.e. below. |

2. **Additional Terms and Conditions**

(a) Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emissions limitations and compliance with the Air Toxics Policy.
The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
The emissions [as defined by OAC rule 3745-77-01 (BB) of hazardous air pollutants (HAPs)] from all emissions units at this facility (K001, K002 and K003), as identified in Section 112(b) of Title III of the Clean Air Act, shall not exceed 9.9 tons per rolling, 12-month period for any single HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs. Historical reports, submitted by the permittee since January of 2000, have shown that this facility is in compliance with these limits.
The combined annual VOC emissions from the entire facility (K001, K002 and K003) shall not exceed 85.44 tons/year, based upon a rolling, 12-month summation of the monthly emissions. In order to make this limit federally enforceable, the permittee is accepting the following limits: 1) the maximum VOC content of any coating employed shall not exceed 7 lbs/gallon; 2) the maximum VOC content of any cleanup material employed shall not exceed 8 lbs/gallon; 3) the maximum annual combined coating usage for the entire facility (K001, K002 and K003) shall not exceed 24,000 gallons/yr, based upon a rolling, 12-month summation of the coating usage figures; and 4) the maximum annual combined cleanup material usage for the entire facility (K001, K002 and K003) shall not exceed 360 gallons/yr,

based upon a rolling, 12-month summation of the cleanup material usage figures. Historical reports, submitted by the permittee since January of 2000, have shown that this facility is in compliance with these limits.
Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Canton local air agency. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC rule 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

B. **Operational Restrictions**

1. The stack(s) servicing this emissions unit shall be unobstructed.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each day for the coating operation:

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

b. an identification as to whether any coatings or cleanup material employed are photochemically reactive materials;

c. the number of gallons of each coating and cleanup material employed;

d. the OC and VOC content of each coating and cleanup material, in pounds per gallon;

e. the daily OC and VOC emissions from the usage of coatings and cleanup material;

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

g. the total OC emissions rate for all coatings and photochemically reactive cleanup materials, for each day during which a photochemically reactive material is employed, in pounds per day; and

h. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, for each day during which a photochemically reactive material is employed, i. e. (h)/(f), 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.]

2. The permittee shall collect and record the following information each month for each coating and cleanup material employed in emissions units K001, K002 and K003:

a. the name and identification number of each coating, as applied;

b. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material, as applied;

c. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

d. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all of the individual HAP contents from (c)];

e. the number of gallons of each coating employed;

f. the name and identification of each cleanup material employed;

g. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

h. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all of the individual HAP contents from (g)];

i. the number of gallons of each cleanup material employed;

j. the total individual HAP emissions, in tons per month;

k. the total combined HAPs emissions, in tons per month;

l. the total VOC emissions, in tons per month;

m. the rolling, 12-month summations of the total coating usage, in gallons per year (the sum of (e) for the previous 12 calendar months);

n. the rolling, 12-month summations of the total cleanup material usage, in gallons per year (the sum of (i) for the previous 12 calendar months);

o. the rolling, 12-month summations of the monthly emissions of each individual HAP, (the sum of (j) for the previous 12 calendar months);
p. the rolling, 12-month summations of the monthly emissions of the total combined HAPs, (the sum of (k) for the previous 12 calendar months); and

q. the rolling, 12-month summations of the monthly emissions of VOC (the sum of (l) for the previous 12 calendar months).

3. The permit to install for these emissions units (K001, K002 and K003) was evaluated based on the actual

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

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Dibutyl Phthalate

TLV (ug/m3): 5,000

Maximum Hourly Emission Rate (lbs/hr): 1.23

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 114

MAGLC (ug/m3): 119

Physical changes to or in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:
a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

4. If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. when the computer modeling is performed, a copy of the resulting computer model runs that shows the results of the application of the "Air Toxic Policy" for the change.

D. **Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:

a. the rolling, 12-month facility-wide limitations on coating and cleanup material usage;

b. an identification of each day during which the average hourly VOC emissions exceeded 4.43 lbs/hr and the actual average hourly VOC emissions for each such day;

c. 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;

d. for the days during which a photochemically reactive material was employed, an identification of each such 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;

e. an identification of each month in which a coating with a VOC content of more than 7 lbs/gallon was employed and the quantity of such coating employed that month;

f. an identification of each month in which a cleanup material with a VOC content of more than 8 lbs/gallon was employed and the quantity of such cleanup material employed that month;

g. the rolling, 12-month facility-wide limitations on the total individual HAP emissions for each HAP from all coatings and cleanup materials employed in emissions units K001, K002 and K003, in pounds or tons per month;

h. the rolling, 12-month facility-wide limitations on the total combined HAP emissions from all coatings and cleanup materials employed in emissions units K001, K002 and K003, in pounds or tons per month; and
i. the rolling, 12-month facility-wide limitations on the total VOC emissions from all coatings and cleanup materials employed in emissions units K001, K002 and K003, in pounds or tons per month.

These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

2. The permittee shall submit annual reports to the Canton local air agency which summarize the following for emissions units K001, K002 and K003:

a. the total VOC emissions from coatings and cleanup materials employed in these emissions unit for the previous calendar year;

b. the total number of gallons of coatings employed in these emissions units for the previous calendar year;

c. the total number of gallons of cleanup materials employed in these emissions units for the previous calendar year;

d. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed in emissions units K001, K002 and K003, in pounds or tons; and

e. the total combined HAPs emissions from all coatings and cleanup materials employed in emissions units K001, K002 and K003, in pounds or tons.

These reports shall be submitted by January 31 of each year.

E. **Testing Requirements**

1. Compliance with the emissions limitations in section II.A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitation:
85.44 tons per year of VOC based upon a rolling, 12-month summation of the monthly emissions from the entire facility

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping as specified in section C.2.q.
Emissions Limitation:
20 lbs/day of VOC
3.65 tons/yr of VOC
8.0 lbs/hr of OC
40 lbs/day of OC
(during any day in which photochemically reactive materials are employed)

Applicable Compliance Method:
Daily records shall be maintained of the VOC content of each coating and cleanup material employed, the daily usage of each coating and cleanup material employed, and the calculated hourly VOC emission rate for all coatings and cleanup materials employed. Compliance with the daily VOC emissions limitation shall be demonstrated by the record keeping requirement in section C.1. of these terms and conditions. USEPA Methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
Emissions Limitation:
Visible emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
OAC rule 3745-17-03 (B)(1)
Emissions Limitation:
9.9 tons/yr of individual HAP per rolling, 12-month period

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping as specified in section C.2.o.
Emissions Limitation:
24.9 tons/yr of total combined HAPs per rolling, 12-month period

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping as specified in section C.2.p.

2. Compliance with the usage restrictions and operational limitations in section A.2 of these terms and conditions shall be determined in accordance with the following methods:
Operational Limitation:
The maximum annual combined coating usage for the entire facility (K001, K002 and K003) shall not exceed 24,000 gallons of coating per year, based upon a rolling, 12-month summation of the coating usage figures.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section C.2.m.
Operational Limitation:
The maximum annual combined cleanup material usage for the entire facility (K001, K002 and K003) shall not exceed 360 gallons/yr, based upon a rolling, 12-month summation of the cleanup material usage figures.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section C.2.n.
Operational Limitation:
The maximum VOC content of any coating employed shall not exceed 7 lbs/gallon.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section C.1.d.
Operational Limitation:
The maximum VOC content of any cleanup material employed shall not exceed 8 lbs/gallon.

Applicable Compliance Method:
Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in section C.1.d.

F. **Miscellaneous Requirements**

1. None



**Facility ID: 1576001885 Emissions Unit ID: P901 Issuance type: Final State Permit To Operate**

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

(a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

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

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| Woodworking room equipment vented to a cyclone or to an internally vented fabric filter (Equipment consists of four rotary cutterhead lathes & five backknife lathes. Engineering Guide #25 places all woodworking operations under one permit. ) | OAC rule 3745-31-05(A)(3) | 0.02 grain particulate per ACFM<br>1.23 lbs/hr of particulate<br>5.39 tons/yr of particulate<br><br>Visible emissions of particulate shall not exceed 10% opacity as a three-minute average. |
| | OAC rule 3745-17-07 | See section A.2.a below |
| | OAC rule 3745-17-11 | See section A.2.a below. |

2. **Additional Terms and Conditions**

(a) The emissions limit based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.

B. **Operational Restrictions**

1. The particulate emissions from the woodworking equipment covered by this permit shall either be vented to a fabric filter which is internally vented or to a cyclone.

2. The cyclone controlling emissions from this emissions unit shall be properly maintained and operated so that the emissions from it do not exceed 0.02 grain/ACFM and that the visible emissions from it do not exceed 10% as a three-minute average.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to eliminate the visible emissions.

D. **Reporting Requirements**

1. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Canton local air agency by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. **Testing Requirements**

1. Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitation
0.02 grain particulate per ACFM
1.23 lbs/hr of particulate
5.39 tons/yr of particulate

Applicable Compliance Method
If required, compliance shall be determined by emission testing using US EPA Method 5 (40 CFR Part 60, Appendix A).
Emissions Limitation
Visible emissions shall not exceed 10% opacity as a three-minute average, except as provided by rule.

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

F. **Miscellaneous Requirements**

1. None