

Facility ID: 1677110035 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 P002](#)
- [Go to Part II for Emissions Unit R002](#)
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- [Go to Part II for Emissions Unit R004](#)

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1677110035 Emissions Unit ID: P002 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Dip Tank	OAC rule 3745-31-02(A)(2) (PTI 16-02156)	The requirements of this rule also include the requirements of OAC rule 3745-21-07(G)(2).  1.48 lbs/hr of volatile organic compounds (VOC) 6.5 tpy of VOC
	OAC rule 3745-31-05(D)	Combined annual coating/cleanup input usage rates* and combined annual emissions from all facility emissions units (P002, R002 - R004) shall not exceed the following as rolling, 12-month summations:  99.5 tpy of VOC*; 24.5 tpy of combined hazardous air pollutants (HAP); and 9.95 tpy of individual HAP.  See A.2.a through A.2.d below.  *Annual VOC input rates are equivalent to annual VOC emission rates and are based upon 100% of the solvent in the coating/cleanup materials being emitted.  See A.2.e below.

OAC rule 3745-21-07(G)(2)

**2. Additional Terms and Conditions**

- (a) The combined annual coating/cleanup usage input rates and combined annual emissions from the entire facility (P002, R002 - R004) shall not exceed the following as rolling, 12-month summations:
  - i. 99.5 tons of VOC;
  - ii. 24.5 tons of combined HAP; and
  - iii. 9.95 tons of any individual HAP.

The potential emissions [as defined by OAC rule 3745-77-01(BB)] of HAPs as identified in Section 112 (b) of Title III of the Clean Air Act from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.  
To ensure enforceability during the first 12 calendar months of operation following the issuance of this

permit, the permittee shall not exceed the maximum allowable cumulative coating/cleanup usage input rates and emissions levels specified in the following table:

Month	Maximum Allowable Coating/Cleanup Input Rates	Maximum Allowable Emissions of VOC (tons)	Maximum Allowable Emissions of HAP (tons)	Maximum Allowable Combined HAP (tons)
1	8.3	0.82	2.0	
1-2	16.6	1.64	4.0	
1-3	24.9	2.46	6.0	
1-4	33.2	3.28	8.0	
1-5	41.5	4.10	10.0	
1-6	49.8	4.92	12.0	
1-7	58.0	5.74	14.0	
1-8	66.3	6.56	16.0	
1-9	74.6	7.38	18.0	
1-10	82.9	8.20	20.0	
1-11	91.2	9.02	22.0	
1-12	99.5	9.95	24.5	

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide coating/cleanup usage input rates limitation and VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable coating/cleanup usage input rates and the annual emission limitations, in tons.

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. None

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

- 1. The permittee shall collect and record the following information for each month for emissions units P002, R002 - R004:
  - 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 HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all 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 HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (g)];
  - i. the number of gallons of each cleanup material employed;
  - j. the total individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials];
  - k. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup materials];
  - l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials];
  - m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year [sum of (l) for the previous 12 calendar months];
  - n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year [the sum of (j) for the previous 12 calendar months]; and
  - o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year [the sum of (k) for the previous 12 calendar months].
- 2. 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. the number of gallons of each coating and cleanup material employed;
  - c. the VOC content of each coating and cleanup material, in pounds per gallon;
  - d. the total number of hours the emissions unit was in operation;
  - e. the total VOC emission rate for all coatings and cleanup materials, in pounds per day; and

f. the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (e)/(d), 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.]

3. The permit to install for emissions units P002, R002 - R004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Isobutyl Acetate  
 TLV (mg/m3): 713  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 15,023  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16,976

Pollutant: Xylene  
 TLV (mg/m3): 434  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 1,318  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Pollutant: Methyl n-Amyl Ketone  
 TLV (mg/m3): 233  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 690  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 5,547

Pollutant: Isopropyl Acetate  
 TLV (mg/m3): 1040  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 10,292  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 24,761  
 Pollutant: Butyl Acetate  
 TLV (mg/m3): 713  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 9,413  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16,976

Pollutant: Acetone  
 TLV (mg/m3): 1,780  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 31,378  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 42,381

Pollutant: Ethylbenzene  
 TLV (mg/m3): 434  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 314  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Pollutant: 2-n-Butoxy-1-ethanol  
 TLV (mg/m3): 121  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 910  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2,881

Pollutant: 1-Butanol  
 TLV (mg/m3): 434  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 439.3  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Pollutant: Methyl Alcohol  
 TLV (mg/m3): 262  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 94.14  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 6238

Pollutant: Methyl isobutyl ketone  
 TLV (mg/m3): 205  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 31.38  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4881

Pollutant: Toluene  
 TLV (mg/m3): 188  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 376.5  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: 1-Propanol  
 TLV (mg/m3): 151.5

Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 721.68  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):3607

Pollutant: Stoddard Solvent  
 TLV (mg/m3):525  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 125.2  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):12,500

Pollutant: 1,2,4-Trimethylbenzene  
 TLV (mg/m3):123  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 94.14  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2929

Pollutant: Propan-2-ol, 1-methoxy-  
 TLV (mg/m3): 369  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 1,568.9  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):8785  
 Pollutant: Ethyl acetate  
 TLV (mg/m3):1440  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 4,706.7  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):34286

Pollutant: Petroleum ether  
 TLV (mg/m3):350  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 3,137.8  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):8333  
 Pollutant: Ethanol  
 TLV (mg/m3): 1,880  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 1,977  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 44,761

Pollutant: Isopropyl Alcohol  
 TLV (mg/m3): 983  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 2,918  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 23,404

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

**D. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage input rate levels and emission levels.

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly mass emission limitation for VOC was exceeded, and the actual average hourly VOC emissions for each such day.
3. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions of this permit.
4. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for P002, R002 - R004. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**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:  
Emission Limitation:

99.5 tpy of VOC for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.1 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

Emission Limitation:

24.5 tpy of combined HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.1 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the HAP content of each coating and cleanup material.

Emission Limitation:

9.95 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.1 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the HAP content of each coating and cleanup material.

Emission Limitation

1.48 lbs/hr of VOC

6.5 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.2 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

**F. Miscellaneous Requirements**

1. The terms and conditions of this Permit to Operate shall supersede all of the air pollution control requirements for this emissions unit contained in the Permit to Operate issued for this emissions unit on May 20, 1999.

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**Facility ID: 1677110035 Emissions Unit ID: R002 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Walk-in spray booth - spray coating of wood parts	OAC rule 3745-31-02(A)(2) (PTI 16-02156)	The requirements of this rule also include the requirements of OAC rule 3745-21-07(G)(2).  45.2 lbs/hr of volatile organic compounds (VOC) 99.5 tpy of VOC
	OAC rule 3745-31-05(D)	Combined annual coating/cleanup input usage rates* and combined annual emissions from all facility emissions units (P002, R002 - R004) shall not exceed the following as rolling, 12-month summations:  99.5 tpy of VOC*; 24.5 tpy of combined hazardous air pollutants (HAP); and 9.95 tpy of individual HAP.  See A.2.a through A.2.d below.  *Annual VOC input rates are equivalent to annual VOC emission rates and are based upon 100% of the solvent in the coating/cleanup materials being emitted.  During any day in which photochemically reactive materials are employed:  8.0 lbs/hr organic compounds (OC) 40 lbs/day OC
	OAC rule 3745-21-07(G)(2)	

**2. Additional Terms and Conditions**

- (a) The combined annual coating/cleanup usage input rates and combined annual emissions from the entire facility (P002, R002 - R004) shall not exceed the following as rolling, 12-month summations:
  - i. 99.5 tons of VOC;
  - ii. 24.5 tons of combined HAP; and
  - iii. 9.95 tons of any individual HAP.
 The potential emissions [as defined by OAC rule 3745-77-01(BB)] of HAPs as identified in Section 112 (b) of Title III of the Clean Air Act from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.  
 To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative coating/cleanup usage input rates and emissions levels specified in the following table:

Month	Maximum Allowable Coating/Cleanup Input Usage Rates	Maximum Allowable Emissions of Individual HAP (tons)	Maximum Allowable Cumulative Emissions and Emissions of VOC (tons)
1	8.3	0.82	2.0
1-2	16.6	1.64	4.0
1-3	24.9	2.46	6.0
1-4	33.2	3.28	8.0
1-5	41.5	4.10	10.0
1-6	49.8	4.92	12.0
1-7	58.0	5.74	14.0
1-8	66.3	6.56	16.0
1-9	74.6	7.38	18.0
1-10	82.9	8.20	20.0
1-11	91.2	9.02	22.0
1-12	99.5	9.95	24.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide coating/cleanup usage input rates limitation and VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable coating/cleanup usage input rates and the annual emission limitations, in tons.

**B. Operational Restrictions**

- 1. None

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

- 1. The permittee shall collect and record the following information for each month for emissions units P002, R002 - R004:
  - a. the name and identification number of each coating, as applied;
  - b. the 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 HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all 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 HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (g)];
- i. the number of gallons of each cleanup material employed;
- j. the total individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials];
- k. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup materials];
- l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (b) times (e) for all of the coatings plus the sum of (i) for all of the cleanup materials];
- m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year [sum of (l) for the previous 12 calendar months];
- n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year [the sum of (j) for the previous 12 calendar months]; and
- o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year [the sum of (k) for the previous 12 calendar months].
2. 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 materials employed are photochemically reactive materials;
- c. the number of gallons of each coating and cleanup material employed;
- d. the VOC content of each coating and cleanup material, in pounds per gallon, and for each day during which a photochemically reactive material is employed, the OC content of each coating and cleanup material, in pounds per gallon;
- e. the total number of hours the emissions unit was in operation;
- f. the total VOC emission rate for all coatings and cleanup materials, in pounds per day;
- g. the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (f)/(e), in pounds per hour (average);
- h. for each day during which a photochemically reactive material is employed, the total OC emission rate for all coatings and cleanup materials, in pounds per day; and
- i. for each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., [h]/[e], in pounds per hour [average].
- [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive materials" is based upon OAC rule 3745-21-01(C)(5).]
3. The permit to install for emissions units P002, R002 - R004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: Isobutyl Acetate  
 TLV (mg/m3): 713  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 15,023  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16,976
- Pollutant: Xylene  
 TLV (mg/m3): 434  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 1,318  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333
- Pollutant: Methyl n-Amyl Ketone

TLV (mg/m3): 233  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 690  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 5,547

Pollutant: Isopropyl Acetate  
TLV (mg/m3): 1040  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 10,292  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 24,761  
Pollutant: Butyl Acetate  
TLV (mg/m3): 713  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 9,413  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16,976

Pollutant: Acetone  
TLV (mg/m3): 1,780  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 31,378  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 42,381

Pollutant: Ethylbenzene  
TLV (mg/m3): 434  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 314  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Pollutant: 2-n-Butoxy-1-ethanol  
TLV (mg/m3): 121  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 910  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2,881

Pollutant: 1-Butanol  
TLV (mg/m3): 434  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 439.3  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Pollutant: Methyl Alcohol  
TLV (mg/m3): 262  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 94.14  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 6238  
Pollutant: Methyl isobutyl ketone  
TLV (mg/m3): 205  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 31.38  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4881

Pollutant: Toluene  
TLV (mg/m3): 188  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 376.5  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: 1-Propanol  
TLV (mg/m3): 151.5  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 721.68  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 3607

Pollutant: Stoddard Solvent  
TLV (mg/m3): 525  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 125.2  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 12,500

Pollutant: 1,2,4-Trimethylbenzene  
TLV (mg/m3): 123  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 94.14  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2929

Pollutant: Propan-2-ol, 1-methoxy-  
TLV (mg/m3): 369  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 1,568.9  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 8785  
Pollutant: Ethyl acetate  
TLV (mg/m3): 1440  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 4,706.7  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 34286

## Pollutant: Petroleum ether

TLV (mg/m3):350

Maximum Hourly Emission Rate (pounds/hour): 135.6

Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 3,137.8

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3):8333

## Pollutant: Ethanol

TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (pounds/hour): 135.6

Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 1,977

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 44,761

## Pollutant: Isopropyl Alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (pounds/hour): 135.6

Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 2,918

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 23,404

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

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

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

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

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

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

**D. Reporting Requirements**

- The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage input rate levels and emission levels.
- The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly mass emission limitation for VOC was exceeded, and the actual average hourly VOC emissions for each such day.
- The permittee shall submit deviation (excursion) reports which include the following information:
  - for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - for the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
- The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions of this permit.
- The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for P002, R002 - R004. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

- Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation:  
99.5 tpy of VOC for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.1 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

Emission Limitation:

24.5 tpy of combined HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.1 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the HAP content of each coating and cleanup material.

Emission Limitation:

9.95 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.1 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the HAP content of each coating and cleanup material.

Emission Limitation:

45.2 lbs/hr of VOC  
99.5 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.2 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

Emission Limitation:

8.0 lbs/hr of OC  
40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.2 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

**F. Miscellaneous Requirements**

1. The terms and conditions of this Permit to Operate shall supersede all of the air pollution control requirements for this emissions unit contained in the Permit to Operate issued for this emissions unit on May 20, 1999.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 1677110035 Emissions Unit ID: R003 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Binks spray booth #1 - spray coating of wood parts	OAC rule 3745-31-02(A)(2) (PTI 16-02156)	The requirements of this rule also include the requirements of OAC rule 3745-21-07(G)(2).

OAC rule 3745-31-05(D)

45.2 lbs/hr of volatile organic compounds (VOC)  
99.5 tpy of VOC

Combined annual coating/cleanup input usage rates\* and combined annual emissions from all facility emissions units (P002, R002 - R004) shall not exceed the following as rolling, 12-month summations:

99.5 tpy of VOC\*;  
24.5 tpy of combined hazardous air pollutants (HAP);  
and  
9.95 tpy of individual HAP.

See A.2.a through A.2.d below.

\*Annual VOC input rates are equivalent to annual VOC emission rates and are based upon 100% of the solvent in the coating/cleanup materials being emitted.

During any day in which photochemically reactive materials are employed:

8.0 lbs/hr organic compounds (OC)  
40 lbs/day OC

OAC rule 3745-21-07(G)(2)

**2. Additional Terms and Conditions**

(a) The combined annual coating/cleanup usage input rates and combined annual emissions from the entire facility (P002, R002 - R004) shall not exceed the following as rolling, 12-month summations:

- i. 99.5 tons of VOC;
- ii. 24.5 tons of combined HAP; and
- iii. 9.95 tons of any individual HAP.

The potential emissions [as defined by OAC rule 3745-77-01(BB)] of HAPs as identified in Section 112 (b) of Title III of the Clean Air Act from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative coating/cleanup usage input rates and emissions levels specified in the following table:

Month	Maximum Allowable Coating/Cleanup Input Usage Rates	Maximum Allowable Emissions of Individual HAP (tons)	Maximum Allowable Emissions of VOC (tons)	Maximum Allowable Emissions of Combined HAP (tons)
1	8.3	0.82	2.0	
1-2	16.6	1.64	4.0	
1-3	24.9	2.46	6.0	
1-4	33.2	3.28	8.0	
1-5	41.5	4.10	10.0	
1-6	49.8	4.92	12.0	
1-7	58.0	5.74	14.0	
1-8	66.3	6.56	16.0	
1-9	74.6	7.38	18.0	
1-10	82.9	8.20	20.0	
1-11	91.2	9.02	22.0	
1-12	99.5	9.95	24.5	

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide coating/cleanup usage input rates limitation and VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable coating/cleanup usage input rates and the annual emission limitations, in tons.

**B. Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information for each month for emissions units P002, R002 - R004:

- a. the name and identification number of each coating, as applied;
- b. the 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 HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all 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 HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (g)];
- i. the number of gallons of each cleanup material employed;
- j. the total individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials];
- k. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup materials];
- l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials];
- m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year [sum of (l) for the previous 12 calendar months];
- n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year [the sum of (j) for the previous 12 calendar months]; and
- o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year [the sum of (k) for the previous 12 calendar months].
2. 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 materials employed are photochemically reactive materials;
- c. the number of gallons of each coating and cleanup material employed;
- d. the VOC content of each coating and cleanup material, in pounds per gallon, and for each day during which a photochemically reactive material is employed, the OC content of each coating and cleanup material, in pounds per gallon;
- e. the total number of hours the emissions unit was in operation;
- f. the total VOC emission rate for all coatings and cleanup materials, in pounds per day;
- g. the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (f)/(e), in pounds per hour (average);
- h. for each day during which a photochemically reactive material is employed, the total OC emission rate for all coatings and cleanup materials, in pounds per day; and
- i. for each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., [h]/[e], in pounds per hour [average].
- [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive materials" is based upon OAC rule 3745-21-01(C)(5).]
3. The permit to install for emissions units P002, R002 - R004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: Isobutyl Acetate  
 TLV (mg/m3): 713  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 15,023  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16,976
- Pollutant: Xylene  
 TLV (mg/m3): 434  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 1,318  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333
- Pollutant: Methyl n-Amyl Ketone  
 TLV (mg/m3): 233  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 690  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 5,547
- Pollutant: Isopropyl Acetate  
 TLV (mg/m3): 1040

Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 10,292  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 24,761  
Pollutant: Butyl Acetate  
TLV (mg/m3): 713  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 9,413  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16,976

Pollutant: Acetone  
TLV (mg/m3): 1,780  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 31,378  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 42,381

Pollutant: Ethylbenzene  
TLV (mg/m3): 434  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 314  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Pollutant: 2-n-Butoxy-1-ethanol  
TLV (mg/m3): 121  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 910  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2,881

Pollutant: 1-Butanol  
TLV (mg/m3): 434  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 439.3  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Pollutant: Methyl Alcohol  
TLV (mg/m3): 262  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 94.14  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 6238  
Pollutant: Methyl isobutyl ketone  
TLV (mg/m3): 205  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 31.38  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4881

Pollutant: Toluene  
TLV (mg/m3): 188  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 376.5  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: 1-Propanol  
TLV (mg/m3): 151.5  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 721.68  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 3607

Pollutant: Stoddard Solvent  
TLV (mg/m3): 525  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 125.2  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 12,500

Pollutant: 1,2,4-Trimethylbenzene  
TLV (mg/m3): 123  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 94.14  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2929

Pollutant: Propan-2-ol, 1-methoxy-  
TLV (mg/m3): 369  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 1,568.9  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 8785  
Pollutant: Ethyl acetate  
TLV (mg/m3): 1440  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 4,706.7  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 34286

Pollutant: Petroleum ether  
TLV (mg/m3): 350  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 3,137.8  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 8333  
Pollutant: Ethanol  
TLV (mg/m3): 1,880

Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 1,977  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 44,761

Pollutant: Isopropyl Alcohol  
 TLV (mg/m3): 983  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 2,918  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 23,404

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - 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
  - physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

- The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage input rate levels and emission levels.
- The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly mass emission limitation for VOC was exceeded, and the actual average hourly VOC emissions for each such day.
- The permittee shall submit deviation (excursion) reports which include the following information:
  - for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - for the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
- The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions of this permit.
- The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for P002, R002 - R004. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

#### E. Testing Requirements

- Compliance with the emission limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:  
 Emission Limitation:  
 99.5 tpy of VOC for entire facility  
 Applicable Compliance Method:  
 Compliance shall be demonstrated based upon the record keeping requirements of section C.1 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.  
 Emission Limitation:

24.5 tpy of combined HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.1 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the HAP content of each coating and cleanup material.

Emission Limitation:

9.95 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.1 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the HAP content of each coating and cleanup material.

Emission Limitation:

45.2 lbs/hr of VOC  
99.5 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.2 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

Emission Limitation:

8.0 lbs/hr of OC  
40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.2 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

**F. Miscellaneous Requirements**

1. The terms and conditions of this Permit to Operate shall supersede all of the air pollution control requirements for this emissions unit contained in the Permit to Operate issued for this emissions unit on May 20, 1999.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

**Facility ID: 1677110035 Emissions Unit ID: R004 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Protectaire spray booth #1 - spray coating of wood parts	OAC rule 3745-31-02(A)(2) (PTI 16-02156)	The requirements of this rule also include the requirements of OAC rule 3745-21-07(G)(2).  45.2 lbs/hr of volatile organic compounds (VOC) 99.5 tpy of VOC  Combined annual coating/cleanup input usage rates* and combined annual emissions from all facility

OAC rule 3745-31-05(D)

emissions units (P002, R002 - R004) shall not exceed the following as rolling, 12-month summations:

- 99.5 tpy of VOC\*;
- 24.5 tpy of combined hazardous air pollutants (HAP);
- and
- 9.95 tpy of individual HAP.

See A.2.a through A.2.d below.

\*Annual VOC input rates are equivalent to annual VOC emission rates and are based upon 100% of the solvent in the coating/cleanup materials being emitted.

During any day in which photochemically reactive materials are employed:

- 8.0 lbs/hr organic compounds (OC)
- 40 lbs/day OC

OAC rule 3745-21-07(G)(2)

**2. Additional Terms and Conditions**

(a) The combined annual coating/cleanup usage input rates and combined annual emissions from the entire facility (P002, R002 - R004) shall not exceed the following as rolling, 12-month summations:

- i. 99.5 tons of VOC;
- ii. 24.5 tons of combined HAP; and
- iii. 9.95 tons of any individual HAP.

The potential emissions [as defined by OAC rule 3745-77-01(BB)] of HAPs as identified in Section 112 (b) of Title III of the Clean Air Act from this facility shall be less than 10 TPY for any single HAP and 25 TPY for any combination of HAPs, based upon rolling, 12-month summations.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative coating/cleanup usage input rates and emissions levels specified in the following table:

Month	Maximum Allowable Coating/Cleanup Input Usage Rates	Maximum Allowable Emissions of Individual HAP (tons)	Maximum Allowable Cumulative Emissions of VOC (tons)	Maximum Allowable Cumulative Emissions of HAP (tons)
1	8.3	0.82	2.0	
1-2	16.6	1.64	4.0	
1-3	24.9	2.46	6.0	
1-4	33.2	3.28	8.0	
1-5	41.5	4.10	10.0	
1-6	49.8	4.92	12.0	
1-7	58.0	5.74	14.0	
1-8	66.3	6.56	16.0	
1-9	74.6	7.38	18.0	
1-10	82.9	8.20	20.0	
1-11	91.2	9.02	22.0	
1-12	99.5	9.95	24.5	

After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide coating/cleanup usage input rates limitation and VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable coating/cleanup usage input rates and the annual emission limitations, in tons.

**B. Operational Restrictions**

1. None

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

1. The permittee shall collect and record the following information for each month for emissions units P002, R002 - R004:

- a. the name and identification number of each coating, as applied;
- b. the 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 HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all 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 HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (g)];

- i. the number of gallons of each cleanup material employed;
- j. the total individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [for each HAP, the sum of (c) times (e) for all of the coatings plus the sum of (g) times (i) for all of the cleanup materials];
- k. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (d) times (e) for all of the coatings plus the sum of (h) times (i) for all of the cleanup materials];
- l. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (b) times (e) for all of the coatings plus the sum of (b) times (i) for all of the cleanup materials];
- m. the rolling, 12-month summation of the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons per year [sum of (l) for the previous 12 calendar months];
- n. the rolling, 12-month summation of individual HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year [the sum of (j) for the previous 12 calendar months]; and
- o. the rolling, 12-month summation of the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per year [the sum of (k) for the previous 12 calendar months].
2. 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 materials employed are photochemically reactive materials;
- c. the number of gallons of each coating and cleanup material employed;
- d. the VOC content of each coating and cleanup material, in pounds per gallon, and for each day during which a photochemically reactive material is employed, the OC content of each coating and cleanup material, in pounds per gallon;
- e. the total number of hours the emissions unit was in operation;
- f. the total VOC emission rate for all coatings and cleanup materials, in pounds per day;
- g. the average hourly VOC emission rate for all coatings and cleanup materials, i.e., (f)/(e), in pounds per hour (average);
- h. for each day during which a photochemically reactive material is employed, the total OC emission rate for all coatings and cleanup materials, in pounds per day; and
- i. for each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all coatings and cleanup materials, i.e., [h]/[e], in pounds per hour [average].
- [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive materials" is based upon OAC rule 3745-21-01(C)(5).]
3. The permit to install for emissions units P002, R002 - R004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):
- Pollutant: Isobutyl Acetate  
 TLV (mg/m3): 713  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 15,023  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16,976
- Pollutant: Xylene  
 TLV (mg/m3): 434  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 1,318  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333
- Pollutant: Methyl n-Amyl Ketone  
 TLV (mg/m3): 233  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 690  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 5,547
- Pollutant: Isopropyl Acetate  
 TLV (mg/m3): 1040  
 Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 10,292  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 24,761
- Pollutant: Butyl Acetate  
 TLV (mg/m3): 713  
 Maximum Hourly Emission Rate (pounds/hour): 135.6

Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 9,413  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16,976

Pollutant: Acetone  
TLV (mg/m3): 1,780  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 31,378  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 42,381

Pollutant: Ethylbenzene  
TLV (mg/m3): 434  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 314  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Pollutant: 2-n-Butoxy-1-ethanol  
TLV (mg/m3): 121  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 910  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2,881

Pollutant: 1-Butanol  
TLV (mg/m3): 434  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 439.3  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Pollutant: Methyl Alcohol  
TLV (mg/m3): 262  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 94.14  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 6238

Pollutant: Methyl isobutyl ketone  
TLV (mg/m3): 205  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 31.38  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4881

Pollutant: Toluene  
TLV (mg/m3): 188  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 376.5  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: 1-Propanol  
TLV (mg/m3): 151.5  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 721.68  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 3607

Pollutant: Stoddard Solvent  
TLV (mg/m3): 525  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 125.2  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 12,500

Pollutant: 1,2,4-Trimethylbenzene  
TLV (mg/m3): 123  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 94.14  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2929

Pollutant: Propan-2-ol, 1-methoxy-  
TLV (mg/m3): 369  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 1,568.9  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 8785  
Pollutant: Ethyl acetate  
TLV (mg/m3): 1440  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 4,706.7  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 34286

Pollutant: Petroleum ether  
TLV (mg/m3): 350  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 3,137.8  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 8333  
Pollutant: Ethanol  
TLV (mg/m3): 1,880  
Maximum Hourly Emission Rate (pounds/hour): 135.6  
Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 1,977  
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 44,761

Pollutant: Isopropyl Alcohol  
TLV (mg/m3): 983

Maximum Hourly Emission Rate (pounds/hour): 135.6  
 Predicted 1 hour Maximum Ground-Level Concentration (ug/m3): 2,918  
 Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 23,404

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

#### D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month facility emission limitation for VOC, individual HAP, and combined HAP, and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage input rate levels and emission levels.
2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly mass emission limitation for VOC was exceeded, and the actual average hourly VOC emissions for each such day.
3. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
  - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.
4. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions of this permit.
5. The permittee shall submit annual reports which specify the VOC, total HAP, and individual HAP emissions, in tons, for P002, R002 - R004. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

#### 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:  
 Emission Limitation:  
 99.5 tpy of VOC for entire facility  
 Applicable Compliance Method:  
 Compliance shall be demonstrated based upon the record keeping requirements of section C.1 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.  
 Emission Limitation:  
 24.5 tpy of combined HAP for entire facility  
 Applicable Compliance Method:  
 Compliance shall be demonstrated based upon the record keeping requirements of section C.1 of these T&Cs.

Formulation data or USEPA Method 24 shall be used to determine the HAP content of each coating and cleanup material.

Emission Limitation:

9.95 tpy of any individual HAP for entire facility

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.1 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the HAP content of each coating and cleanup material.

Emission Limitation:

45.2 lbs/hr of VOC

99.5 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.2 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

Emission Limitation:

8.0 lbs/hr of OC

40 lbs/day of OC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements of section C.2 of these T&Cs. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

**F. Miscellaneous Requirements**

1. The terms and conditions of this Permit to Operate shall supersede all of the air pollution control requirements for this emissions unit contained in the Permit to Operate issued for this emissions unit on May 20, 1999.