



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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50 W. Town St., Suite 700
Columbus, Ohio 43215

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MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

10/15/2008

DAVID MILLER
Carlisle Oak
PO Box 45
Walnut Creek, OH 44687

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0238000188
Permit Number: P0103675
Permit Type: Initial Installation
County: Holmes

Certified Mail

Yes	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Holmes County Hub. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-NEDO

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Carlisle Oak is a finisher of wood furniture. The facility currently has two wood furniture coating booths, emissions units R001 and R002, and proposed to install a new wood furniture coating booth, emissions unit R003. Emissions units R001 and R003 are used for coating sealer and topcoat, and emissions unit R002 is used for coating stains.

3. Facility Emissions and Attainment Status:

The facility is located in Walnut Creek , Holmes County, an area designated as "attainment" for all criteria pollutants, such as ozone, sulfur dioxide, PM_{2.5}, carbon monoxide and lead. Carlisle Oak will not be a "Major Source" for a single hazardous air pollutant (HAP) and combined total HAPs, based upon the restriction of VOC emissions from emissions units R001, R002, and R003 combined. Therefore, the requirements of Title V and Wood Furniture MACT, 40 CFR Part 63, subpart JJ, will not apply to them.

4. Source Emissions:

This FEPTIO contains terms and conditions that require VOC emissions from emissions units R001, R002, and R003 combined not to exceed 24.90 tons per year. Due to the limitation of the total VOC emissions, it will be inherently limited each single HAP emissions to less than 10 tons per year and combined total HAPs emissions to less than 25 tons per year. Carlisle OAK is also required by this permit to track VOC emissions, keep records, and submit reports.

5. Conclusion:

The emission limitation contained in this FEPTIO are adequate to provide federally enforceable limitations to ensure that the applicable MACT and Title V thresholds will not be exceeded.

6. Please provide additional notes or comments as necessary:

To limit VOC emissions not to exceed 24.90 tons per year, the facility will be also avoided being subject to the requirements of the Wood Furniture best available technology (BAT) found in OAC 3745-21-15.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC _(R001, R002, and R003)	24.90

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Carlisle Oak

Issue Date: 10/15/2008

Permit Number: P0103675

Permit Type: Initial Installation

Permit Description: Installation of emissions unit R003 and modification of emissions unit R001. Permit is also used to limit VOC emissions to avoid requirements of Title V, Wood Furniture MACT, 40 CFR Part 63, subpart JJ, as well as Wood Furniture BAT required by OAC 3745-21-15.

Facility ID: 0238000188

Facility Location: Carlisle Oak
3872 TR 162,
Sugar Creek, OH 44681

Facility Description: Nonupholstered Wood Household Furniture Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Tracy Gu at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road or (330)425-9171. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

**Air Pollution Permit-to-Install and Operate
for
Carlisle Oak**

Facility ID: 0238000188
Permit Number: P0103675
Permit Type: Initial Installation
Issued: 10/15/2008
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Air Pollution Permit-to-Install and Operate
for
Carlisle Oak

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103675

Facility ID: 0238000188

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0238000188

Application Number(s): A0035593

Permit Number: P0103675

Permit Description: Installation of emissions unit R003 and modification of emissions unit R001. Permit is also used to to limit VOC emissions to avoid requirements of Title V, Wood Furniture MACT, 40 CFR Part 63, subpart JJ, as well as Wood Furniture BAT required by OAC 3745-21-15.

Permit Type: Initial Installation

Permit Fee: \$600.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 10/15/2008

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Carlisle Oak
3872 TR 162
Sugar Creek, OH 44681

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103675

Facility ID: 0238000188

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0103675

Permit Description: Installation of emissions unit R003 and modification of emissions unit R001. Permit is also used to to limit VOC emissions to avoid requirements of Title V, Wood Furniture MACT, 40 CFR Part 63, subpart JJ, as well as Wood Furniture BAT required by OAC 3745-21-15.

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

Group Name: Wood Furniture Finish Booths

Emissions Unit ID:	R001
Company Equipment ID:	Finish Booth
Superseded Permit Number:	02-22930
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R003
Company Equipment ID:	Finish Booth #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103675

Facility ID: 0238000188

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103675

Facility ID: 0238000188

Effective Date: To be entered upon final issuance

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103675

Facility ID: 0238000188

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. 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).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) 2, 3, 4, 5, 6, and 7.
2. In accordance with OAC rule 3745-31-05(D), permittee proposed voluntary restriction of VOC emissions from all coatings and cleanup materials from emissions units R001, R002 and R003, combined, not to exceed 24.90 tons per year, as a rolling, 12-month summation, to avoid being subject to the requirements of Title V, Wood Furniture MACT, 40 CFR Part 63, Subpart JJ, as well as the Wood Furniture best available technology (BAT) found in OAC rule 3745-21-15.
3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table for emissions units R001, R002 and R003, combined:

Month	Maximum Allowable VOC (tons)
1	2.4
1-2	4.8
1-3	7.2
1-4	9.6
1-5	12.0
1-6	14.4
1-7	16.8
1-8	19.2
1-9	21.6
1-10	24.0
1-11	24.9
1-12	24.9



4. The permittee shall collect and record the following information each month for emissions units R001, R002 and R003:
 - a) the actual monthly VOC emissions from all coatings and cleanup materials for emissions units R001, R002 and R003, combined; and
 - b) the rolling, 12-month actual VOC emissions from emissions units R001, R002 and R003, combined.

5. The permittee submit quarterly deviation (excursion) reports that identify each month during which the rolling, 12-month VOC emissions from emissions units R001, R002 and R003, combined, exceed 24.9 tons per year, and the actual VOC emissions for each such month. The reports shall be submitted in accordance with the reporting requirements specified in Standard Terms and Conditions, section A of this permit.

6. The permittee shall submit annual reports that summarize the VOC emissions from emissions units R001, R002 and R003, combined. The reports shall include the emission calculations, shall be submitted by August 15 of each year, and shall cover the previous calendar year.

7. Compliance with the allowable emission limitation in section B.2 shall be determined in accordance with the following method:
 - a) Emission Limitation:

24.9 tons of VOC emissions per year from emissions units R001, R002 and R003, combined, for all coatings and cleanup materials

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in section B.4.b) above.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103675

Facility ID: 0238000188

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - Wood Furniture Finish Booths: R001, R003,

EU ID	Operations, Property and/or Equipment Description
R001	Finish booth 1 for sealer/topcoat. Wood furniture coating operation with overspray filters. Coating air dried.
R003	Finish booth 2 for sealer/topcoat. Wood furniture coating operation with overspray filters. Coatings are air dried.

a) 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. d)(5), d)(6), d)(7) and e)(3)

(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. b)(1)d and b)(2)c

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(C)	See sections c)(1), d)(8), d)(9), d)(10), d)(11), and d)(12) below.
b.	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions from all coatings and cleanup materials for each emissions unit shall not exceed eight (8) pounds per hour and forty (40) pounds per day. See section b)(2)a below.
c.	OAC rule 3745-31-05(A)(3)	See section b)(2)b below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(C) and OAC rule 3745-21-07(G)(2).
d.	OAC rule 3745-31-05(D)	See sections B.2, B.3 and b)(2)c.
e.	OAC rule 3745-114-01	See sections d)(5), d)(6), d)(7) and e)(3) below.



(2) Additional Terms and Conditions

- a. Each emissions unit becomes subject to OAC rule 3745-21-07(G)(2) on any day when any photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), is employed.

The OC emission limitation of 8 pounds per hour and 40 pounds per day, when photochemically reactive materials are employed, shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC 3745-21-07 (G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting, and testing requirements related to these hourly and daily limitations included in sections b)(1)b, b)(2)a, d)(2), e)(2)a, and f)(1)a shall be void.

- b. Each day, when photochemically reactive materials are not employed, the volatile organic compound (VOC) emissions from all coatings shall not exceed 19.74 pounds per hour for each emissions unit. This emission limitation is based upon the maximum application rate of 3.5 gallons per hour for each of emissions units R001 and R003.

The requirement to comply with this emission limitation only on days when photochemically reactive coatings and cleanup materials are not employed shall cease on the date the U.S. EPA approves revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the revised rule is added to the Ohio SIP, this emission limitation shall be effective every day when each emissions unit is in operation.

- c. The VOC content for all coatings used in each of emissions units R001 and R003 shall not exceed 5.64 pounds per gallon, as applied.

c) Operational Restrictions

- (1) All exhaust from each spray booth shall pass through the dry overspray filters whenever the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records that document all time periods that dry filters were not in service when the emissions unit was in operation.

- (2) The permittee shall collect and record the following information each day for each emissions unit when photochemically reactive materials are employed in the emissions unit:

- a. the company identification for each coating and clean-up material employed;
- b. the number of gallons of each coating and clean-up material employed minus the number of gallons of coating and/or clean-up material recovered for disposal;
- c. the OC content of each coating and clean-up material, in pounds OC per gallon;



- d. the total OC emissions from all coatings and clean-up materials, in pounds per day;
- e. the total number of hours this emissions unit is in operation;
- f. the average hourly OC emission rate for all coatings and clean-up materials, i.e., (d)/(e), in pounds per hour (average);
- g. the VOC content of each coating and clean-up material, in pounds VOC per gallon; and
- h. the total VOC emissions rate from all coatings and clean-up materials, in pounds VOC per day.

[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 material” is based upon OAC rule 3745-21-01(C)(5).]

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, section d)(2) shall be voided entirely.]

- (3) The permittee shall collect and record the following information each day for each emissions unit when photochemically reactive coatings or clean-up materials are not employed in the emissions unit:
 - a. the company identification for each coating or clean-up material employed;
 - b. documentation that photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5), was not employed;
 - c. the VOC content of each coating, in pounds per gallon, as applied;
 - d. the number of gallons of each coating employed;
 - e. the total VOC emissions from all coatings employed, in pounds per day, i.e., sum of (c) times (d);
 - f. the total number of hours this emissions unit is in operation; and
 - g. the average hourly VOC emission rate for all coatings, i.e., (e)/(f), in pounds per hour.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the records required by this section shall be kept on a daily basis with no reference to photochemically reactive materials. Section d)(3)(b) will be voided entirely.]

- (4) The permittee shall collect and record the following information each month for each emissions units R001, R002 and R003:
 - a. the number of gallons of each clean-up materials employed minus the number of gallons of the clean-up materials recovered for disposal for the days during which photochemically reactive materials are not employed;



- b. the VOC content of each clean-up materials, in pounds per gallon, for the days during which photochemically reactive materials are not employed;
- c. the total VOC emissions from clean-up materials employed, in pounds per month, i.e., sum of (b) times (a), for all the days during which photochemically reactive materials are not employed; and
- d. the actual monthly VOC emissions from all coatings and cleanup materials [i.e., sum of the daily VOC emissions in sections d)(2)h and d)(3)e, plus the monthly VOC emissions from clean-up materials in section d)(4)c for all the days during which photochemically reactive materials are not employed].

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, records required by sections d)(4)a, d)(4)b, and d)(4)c for “the days during which photochemically reactive materials are not employed”, as well as any reference to "section d)(2)(h)" shall be voided.]

- (5) The permit to install for these emissions units (R001, R003) were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit application. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compounds emitted from these emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists’ (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”;
or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists’ (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).



- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

- i. Toxic Contaminant: Toluene

TLV (mg/m³): 75.36196

Maximum Hourly Emission Rate (lbs/hr): 5.52

Predicted 1-Hour Maximum Ground Level Concentration (ug/m³):
1,346.58

MAGLC (ug/m³): 1,794.96

- ii. Toxic Contaminant: Xylene

TLV (mg/m³): 434.19223

Maximum Hourly Emission Rate (lbs/hr): 2.62

Predicted 1-Hour Maximum Ground Level Concentration (ug/m³): 637.55

MAGLC (ug/m³): 10,337.91

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

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



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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

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

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

- (8) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the overspray filters with any modifications deemed necessary by the permittee during the time period in which the overspray filters are utilized in each emissions unit.



- (9) The permittee shall operate the overspray filters in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
 - (10) The permittee shall conduct periodic inspections of the overspray filters in each emissions unit to determine whether the filters are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any overspray filters deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the overspray filters, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the overspray filters while the emissions unit is shut down and perform any needed maintenance and repair for the overspray filters to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
 - (11) The permittee shall document each inspection of overspray filters by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
 - (12) In the event that the overspray filters are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the overspray filters shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the overspray filters are not operating in accordance with such requirements.
- e) Reporting Requirements
- (1) The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were not in service or not operated in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
 - (2) The permittee submit quarterly deviation (excursion) reports that identify:
 - a. each day during which OC emissions from each emissions unit for all coatings and clean-up materials exceeded 8 pounds per hour and/or 40 pounds per day, when a photochemically reactive material was employed, and the actual OC emissions for each such day for each emissions unit;
 - b. each day during which the average VOC emissions from each emissions unit for all coatings exceeded the 19.74 pounds per hour, when no photochemically reactive material was employed, and the actual average hourly VOC emissions for each such day for each emissions unit; and



- c. each day during which the VOC content for any coatings applied in each of emissions units R001 and R003 exceeded 5.64 pounds per gallon, and the actual VOC content for each such coating of each day for each emissions unit.

The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Standard Terms and Conditions, section A of this permit.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, section e)(2)(a) and the reference of photochemically reactive material in section e)(2)(b) that shall be voided.]

- (3) The permittee shall also submit annual reports to the Ohio EPA, Northeast District Office, documenting any changes made to a parameter or value used in the dispersion model (including the air toxic compounds emitted and the emission rate), that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect.
- (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in sections b)(1) and b)(2) shall be determined in accordance with the following methods:

a. Emission Limitation:

8 pounds per hour and 40 pounds per day of OC emissions from each emissions unit for each day when photochemically reactive materials are employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2).

b. Emission Limitation:

19.74 pounds per hour of VOC emissions from all coatings for each emissions unit for each day when photochemically reactive materials are not employed

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(3).

c. Emission Limitation:



5.64 pounds VOC per gallon of coating, as applied

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in sections d)(2)g and d)(3)c.

Any determination of VOC content, solids contents, or density of coating materials or cleanup material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings or cleanup materials by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If pursuant to section 11.4 of Method 24, 40 CFR Part 60 Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the U.S. EPA and shall use formulation data for that coating or cleanup material to demonstrate compliance until the U.S. EPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, section f)(1)(a), the reference to photochemically reactive materials in section f)(1)(b), as well as any reference to section d)(2)g shall be voided.]

g) Miscellaneous Requirements

- (1) None.