



Street Address:

State of Ohio Environmental Protection Agency

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

**RE: FINAL PERMIT TO INSTALL
HAMILTON COUNTY
Application No: 14-4693**

CERTIFIED MAIL

DATE: August 18, 1999

Wittrock Woodworking & Mfg Inc
David Thrasher
120 May Drive
Harrison, OH 45030

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:



Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
Hamilton County Dept of Environmental Services

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

**Terms and
Conditions**

**Issue Date: August 18, 1999
Effective Date: August 18, 1999**

FINAL CHAPTER 31 PERMIT TO INSTALL 14-4693

Application Number: 14-4693
APS Premise Number: 1431054014
Permit Fee: **\$2200**
Name of Facility: Wittrock Woodworking & Mfg Inc
Person to Contact: David Thrasher
Address: 120 May Drive
Harrison, OH 45030

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4201 Malsbary Road
Blue Ash, OHIO**

Description of proposed emissions unit(s):
WOODWORKING OPERATION W/FABRIC FILTER, SAWDUST UNLOADING, AND SEVEN WOOD COATING LINES.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of

Wittrock Woodworking & Mfg Inc

PTI Application: **14-4693**

August 18, 1999

Facility ID: **1431054014**

Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

Wittrock Woodworking & Mfg Inc

Facility ID: 1431054014

PTI Application: 14-4693

August 18, 1999

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	24.5
PM	22.39
PM ₁₀	7.16

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
Woodworking operation with baghouse	OAC rule 3745-31-05	10.87 pounds/hour PM 21.79 TPY PM 3.48 pounds/hour PM ₁₀ 6.97 TPY PM ₁₀
	OAC rule 3745-17-07(A)	See T&C A.2.2.a
	OAC rule 3745-17-07(B)	See T&C A.2.2.b
	OAC rule 3745-17-08	See T&C B.3. 0.03 grains/dscf
	OAC rule 3745-17-11	The emissions limitation established by OAC rule 3745-17-11 is less stringent than OAC rule 3745-31-05 (BAT). See T&C F.1.
	OAC rule 3745-15-07	

2. Additional Terms and Conditions

- 2.a Visible particulate emissions from the stack for emissions unit P901 shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.b Visible fugitive particulate emissions from emissions unit P901 shall not exceed 20 percent

opacity, as a three-minute average, except as specified by rule.

- 2.c** Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of a baghouse.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 4 to 6 inches of water while emissions unit P901 is in operation.
2. The maximum amount of sawdust collected shall not exceed 4000 cubic yards per year.
3. The permittee shall employ the use of a partial enclosure to minimize fugitive particulate emissions.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a once per day basis.
2. The permittee shall maintain monthly records of the amount of sawdust collected in this emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term and condition B.1.
2. The permittee shall submit annual reports which specify the total particulate matter emissions from emissions unit P901 for the previous calendar year. Emissions shall be calculated as follows: $[(\text{amount of sawdust collected, in cubic yards the previous year} \times 7.88) + (\text{amount of sawdust collected, in cubic yards the previous year} \times 2.99)] \div 2000$. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit annual reports that identify any exceedances of the annual sawdust collected limit, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the PM/PM₁₀ emission limitations in these terms and conditions shall be

demonstrated by the emission calculations.

2. If testing is required to determine compliance with the allowable PM/PM₁₀ emission limitations, then testing shall be conducted using the following methods:

- a. For PM: Method 5 of 40 CFR Part 60, Appendix A shall be used.
- b. For PM₁₀: Method 201 of 40 CFR part 51, Appendix M shall be used.
3. Compliance with the visible stack particulate emission limitation shall be demonstrated by the methods outlined in OAC rule 3745-17-03(B)(1).
4. Compliance with the visible fugitive particulate emission limitation shall be demonstrated by the methods outlined in OAC rule 3745-17-03(B)(3).
5. Compliance with the pressure drop limit in T&C B.1 shall be demonstrated by the recordkeeping in T&C C.1.
6. Compliance with the amount of sawdust collected limit in T&C B.2 shall be demonstrated by the recordkeeping in T&C C.2.

F. Miscellaneous Requirements

1. If probable cause exists indicating any of this emissions unit is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of the emissions unit shall be required to submit and implement a control program which will bring the emissions unit into compliance.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
Sawdust unloading	OAC rule 3745-31-05	24.0 pounds/week PM 0.6 TPY PM 7.68 pounds/week PM10 0.19 TPY PM ₁₀
	OAC rule 3745-17-07(B)	See T&C A.2.2.a
	OAC rule 3745-17-08	See T&C B.1.

2. Additional Terms and Conditions

- 2.a Visible fugitive particulate emissions from emissions unit F001 shall not exceed 20 percent opacity, as a three-minute average, except as specified by rule.

B. Operational Restrictions

- 1. The drop height of the telescopic tube shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust from emissions unit F001 during sawdust unloading.
- 2. The maximum amount of sawdust unloaded shall not exceed 4000 cubic yards per year.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain monthly records of the amount of sawdust unloaded.

D. Reporting Requirements

1. The permittee shall submit annual reports which specify the total particulate matter emissions from emissions unit F001 for the previous calendar year. Emissions shall be calculated as follows:

(amount of sawdust collected the previous year x 0.15 x 2) ÷ 2000. These reports shall be submitted by January 31 of each year.

2. The permittee shall submit annual reports that identify any exceedances of the annual sawdust unloaded limit, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the PM/PM₁₀ emission limitations in these terms and conditions shall be demonstrated by the required recordkeeping and reports.
2. If testing is required to determine compliance with the allowable PM/PM₁₀ emission limitations, then testing shall be conducted using the following methods:
 - a. For PM: Method 5 of 40 CFR Part 60, Appendix A shall be used.
 - b. For PM₁₀: Method 201 of 40 CFR part 51, Appendix M shall be used.
3. Compliance with the visible fugitive particulate emission limitation shall be demonstrated by the methods outlined in OAC 3745-17-03(B)(3).
4. Compliance with the amount of sawdust unloaded limit in T&C B.2 shall be demonstrated by the recordkeeping in T&C C.1.

F. Miscellaneous Requirements

1. If probable cause exists indicating any of these emissions units is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of the emissions unit shall be required to submit and implement a control program which will bring the emissions unit into compliance.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(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 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>
Wood coating line #1	OAC rule 3745-31-05	3.5 TPY OC
	OAC rule 3745-21-07(G)	8 pounds/hour OC 40 pounds/day OC
	OAC rule 3745-15-07	See T&C F.1

2. Additional Terms and Conditions

- 2.a All coating and cleanup materials employed in emissions unit R001 shall have an OC content limit of 7.0 pounds of OC per gallon.
- 2.b Compliance with OAC rule 3745-31-05 shall be demonstrated by compliance with the air toxics policy and limited coating and cleanup material usage.
- 2.c The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9* TPY for any single HAP as a rolling, 12-month summation and 24.9* TPY for any combination of HAPs as a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs emissions limits specified in the following table:

<u>Months(s)</u>	<u>Maximum Allowable Single HAP Usage (Tons)</u>	<u>Maximum Allowable Combined HAP Usage(Tons)</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.7	16.7
1-9	7.5	18.8
1-10	8.3	20.8
1-11	9.2	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs emissions limit shall be based upon a rolling, 12-month summation.

* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

B. Operational Restrictions

1. The maximum annual coating and cleanup material usage for emissions unit R001 shall not exceed 1000 gallons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. 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 (b)];

- d. the number of gallons of each coating employed;
- e. the name and identification of each cleanup material employed;

- f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. 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 (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12 month period [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material]; and,
 - j. the total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].
- * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
- ** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.
2. The permittee shall collect and record the following information for each day for emissions unit R001:
- 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 organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all coatings and cleanup

Wittrock Woodworking & Mfg Inc

PTI Application: **14 4602**

August

Facility ID: **1431054014**

Emissions Unit ID: **R001**

materials, i.e., (d)/(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.]

3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 deviation (excursion) reports which include the following information:
 - a. An identification of each hour during which the organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.
 - b. An identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

If no exceedances occurred during the reporting period then a report is required stating so.

2. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R001 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation reports which identify any exceedance of the coating and cleanup material OC content or gallon usage limitations.

E. Testing Requirements

1. Compliance with the OC emission limitations in these terms and conditions shall be demonstrated by the required recordkeeping in T&C C.2.

22

Wittro

PTI A₁

August 18, 1999

Emissions Unit ID: **R001**

2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the organic compound contents of the materials, including cleanup materials, employed in this emissions unit.

3. Compliance with the HAP limitations outlined in Term A.2.c shall be demonstrated by the record keeping in Term C.1.
4. Compliance with the gallon usage restriction in T&C B.1 shall be demonstrated by the record keeping in Term C.2.

F. Miscellaneous Requirements

1. If probable cause exists indicating any of these emissions units is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of the emissions unit shall be required to submit and implement a control program which will bring the emissions unit into compliance.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: isobutanol

TLV (ug/m3): 152

Maximum Hourly Emission Rate (lbs/hr): 1.42

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 163

MAGLC (ug/m3): 3619

Pollutant: toluene

TLV (ug/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 3.03

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 347

MAGLC (ug/m3): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is

Wittrock Woodworking & Mfg Inc

PTI Application: **14 4602**

Augus

Facility ID: **1431054014**

Emissions Unit ID: **R001**

hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
Wood coating line #2	OAC rule 3745-31-05	3.5 TPY OC
	OAC rule 3745-21-07(G)	8 pounds/hour OC 40 pounds/day OC
	OAC rule 3745-15-07	See T&C F.1

2. Additional Terms and Conditions

- 2.a All coating and cleanup materials employed in emissions unit R002 shall have an OC content limit of 7.0 pounds of OC per gallon.
- 2.b Compliance with OAC rule 3745-31-05 shall be demonstrated by compliance with the air toxics policy and limited coating and cleanup material usage.

Wittrock Woodworking & Mfg Inc

PTI Application: **14-1602**

August

Facility ID: **1431054014**

Emissions Unit ID: **R002**

- 2.c** The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9* TPY for any single HAP as a rolling, 12-month summation and 24.9* TPY for any combination of HAPs as a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs emissions limits specified in the following table:

Wittrock Woodworking & Mfg Inc

PTI Application: 14-1602

August

Facility ID: 1431054014

Emissions Unit ID: R002

Month(s)	Maximum Allowable Single HAP Usage (Tons)	Maximum Allowable Combined HAP Usage(Tons)
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.7	16.7
1-9	7.5	18.8
1-10	8.3	20.8
1-11	9.2	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs emissions limit shall be based upon a rolling, 12-month summation.

* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

B. Operational Restrictions

1. The maximum annual coating and cleanup material usage for emissions unit R002 shall not exceed 1000 gallons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. 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 (b)];

Wittro
PTI A1
August 18, 1999

Emissions Unit ID: **R002**

- d. the number of gallons of each coating employed;
- e. the name and identification of each cleanup material employed;

- f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. 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 (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12 month period [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material]; and,
 - j. the total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].
- * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
- ** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.
2. The permittee shall collect and record the following information for each day for emissions unit R002:
- 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 organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all coatings and cleanup

materials, i.e., (d)/(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.]

3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. 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 deviation (excursion) reports which include the following information:
 - a. An identification of each hour during which the organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.
 - b. An identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

If no exceedances occurred during the reporting period then a report is required stating so

2. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R002 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation reports which identify any exceedance of the coating and cleanup material OC content or gallon usage limitations.

E. Testing Requirements

1. Compliance with the OC emission limitations in these terms and conditions shall be demonstrated by the required recordkeeping in T&C C.2.

2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the organic compound contents of the materials, including cleanup materials, employed in this emissions unit.

3. Compliance with the HAP limitations outlined in Term A.2.c shall be demonstrated by the record keeping in Term C.1.
4. Compliance with the gallon usage restriction in T&C B.1 shall be demonstrated by the record keeping in Term C.2.

F. Miscellaneous Requirements

1. If probable cause exists indicating any of these emissions units is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of the emissions unit shall be required to submit and implement a control program which will bring the emissions unit into compliance.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: isobutanol

TLV (ug/m³): 152

Maximum Hourly Emission Rate (lbs/hr): 1.42

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 163

MAGLC (ug/m³): 3619

Pollutant: toluene

TLV (ug/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 3.03

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 347

MAGLC (ug/m³): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is

hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
Wood coating line #3	OAC rule 3745-31-05	3.5 TPY OC
	OAC rule 3745-21-07(G)	8 pounds/hour OC 40 pounds/day OC
	OAC rule 3745-15-07	See T&C F.1

2. Additional Terms and Conditions

- 2.a All coating and cleanup materials employed in emissions unit R003 shall have an OC content limit of 7.0 pounds of OC per gallon.
- 2.b Compliance with OAC rule 3745-31-05 shall be demonstrated by compliance with the air toxics policy and limited coating and cleanup material usage.

- 2.c** The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9* TPY for any single HAP as a rolling, 12-month summation and 24.9* TPY for any combination of HAPs as a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs emissions limits specified in the following table:

Wittr
PTI A₁
August 18, 1999

Emissions Unit ID: **R003**

<u>Month(s)</u>	<u>Maximum Allowable Single HAP Usage (Tons)</u>	<u>Maximum Allowable Combined HAP Usage(Tons)</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.7	16.7
1-9	7.5	18.8
1-10	8.3	20.8
1-11	9.2	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs emissions limit shall be based upon a rolling, 12-month summation.

* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

B. Operational Restrictions

1. The maximum annual coating and cleanup material usage for emissions unit R003 shall not exceed 1000 gallons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. 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 (b)];

- d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. 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 (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12 month period [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material]; and,
 - j. the total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].
- * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
- ** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.
2. The permittee shall collect and record the following information for each day for emissions unit R003:
 - 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 organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day.

- e. The total number of hours the emissions unit was in operation.
- f. The average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(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.]

3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. 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 deviation (excursion) reports which include the following information:
 - a. An identification of each hour during which the organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.
 - b. An identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

If no exceedances occurred during the reporting period then a report is required stating so

2. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R003 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation reports which identify any exceedance of the coating and cleanup material OC content or gallon usage limitations.

E. Testing Requirements

1. Compliance with the OC emission limitations in these terms and conditions shall be demonstrated by the required recordkeeping in T&C C.2.

Wittrock Woodworking & Mfg Inc

PTI Application: **14 4603**

August

Facility ID: **1431054014**

Emissions Unit ID: **R003**

2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the organic compound contents of the materials, including cleanup materials, employed in this emissions unit.

3. Compliance with the HAP limitations outlined in Term A.2.c shall be demonstrated by the record keeping in Term C.1.
4. Compliance with the gallon usage restriction in T&C B.1 shall be demonstrated by the record keeping in Term C.2.

F. Miscellaneous Requirements

1. If probable cause exists indicating any of these emissions units is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of the emissions unit shall be required to submit and implement a control program which will bring the emissions unit into compliance.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: isobutanol

TLV (ug/m³): 152

Maximum Hourly Emission Rate (lbs/hr): 1.42

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 163

MAGLC (ug/m³): 3619

Pollutant: toluene

TLV (ug/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 3.03

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 347

MAGLC (ug/m³): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is

hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
Wood coating line #4	OAC rule 3745-31-05	3.5 TPY OC
	OAC rule 3745-21-07(G)	8 pounds/hour OC 40 pounds/day OC
	OAC rule 3745-15-07	See T&C F.1

2. Additional Terms and Conditions

- 2.a All coating and cleanup materials employed in emissions unit R004 shall have an OC content limit of 7.0 pounds of OC per gallon.
- 2.b Compliance with OAC rule 3745-31-05 shall be demonstrated by compliance with the air

toxics policy and limited coating and cleanup material usage.

- 2.c** The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9* TPY for any single HAP as a rolling, 12-month summation and 24.9* TPY for any combination of HAPs as a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs emissions limits specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Single HAP Usage (Tons)</u>	<u>Maximum Allowable Combined HAP Usage(Tons)</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.7	16.7
1-9	7.5	18.8
1-10	8.3	20.8
1-11	9.2	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs emissions limit shall be based upon a rolling, 12-month summation.

* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

B. Operational Restrictions

1. The maximum annual coating and cleanup material usage for emissions unit R004 shall not exceed 1000 gallons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. 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 (b)];

- d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. 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 (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12 month period [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material]; and,
 - j. the total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].
- * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
- ** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.
2. The permittee shall collect and record the following information for each day for emissions unit R004:
 - 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 organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day.

Wittrock Woodworking & Mfg Inc

PTI Application: **14 4602**

August

Facility ID: **1431054014**

Emissions Unit ID: **R004**

- e. The total number of hours the emissions unit was in operation.
- f. The average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(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.]

3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 deviation (excursion) reports which include the following information:
 - a. An identification of each hour during which the organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.
 - b. An identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

If no exceedances occurred during the reporting period then a report is required stating so

2. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R004 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation reports which identify any exceedance of the coating and cleanup material OC content or gallon usage limitations.

E. Testing Requirements

1. Compliance with the OC emission limitations in these terms and conditions shall be demonstrated by the required recordkeeping in T&C C.2.

Wittrock Woodworking & Mfg Inc

PTI Application: **14-1602**

August

Facility ID: **1431054014**

Emissions Unit ID: **R004**

2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the organic compound contents of the materials, including cleanup materials, employed in this emissions unit.

3. Compliance with the HAP limitations outlined in Term A.2.c shall be demonstrated by the record keeping in Term C.1.
4. Compliance with the gallon usage restriction in T&C B.1 shall be demonstrated by the record keeping in Term C.2.

F. Miscellaneous Requirements

1. If probable cause exists indicating any of these emissions units is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of the emissions unit shall be required to submit and implement a control program which will bring the emissions unit into compliance.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: isobutanol

TLV (ug/m³): 152

Maximum Hourly Emission Rate (lbs/hr): 1.42

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 163

MAGLC (ug/m³): 3619

Pollutant: toluene

TLV (ug/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 3.03

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 347

MAGLC (ug/m³): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is

hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
Wood coating line #5	OAC rule 3745-31-05	3.5 TPY OC
	OAC rule 3745-21-07(G)	8 pounds/hour OC 40 pounds/day OC
	OAC rule 3745-15-07	See T&C F.1

2. Additional Terms and Conditions

- 2.a All coating and cleanup materials employed in emissions unit R005 shall have an OC content limit of 7.0 pounds of OC per gallon.
- 2.b Compliance with OAC rule 3745-31-05 shall be demonstrated by compliance with the air toxics policy and limited coating and cleanup material usage.

- 2.c** The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9* TPY for any single HAP as a rolling, 12-month summation and 24.9* TPY for any combination of HAPs as a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs emissions limits specified in the following table:

Wittr
PTI A₁
August 18, 1999

Emissions Unit ID: **R005**

<u>Month(s)</u>	<u>Maximum Allowable Single HAP Usage (Tons)</u>	<u>Maximum Allowable Combined HAP Usage(Tons)</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.7	16.7
1-9	7.5	18.8
1-10	8.3	20.8
1-11	9.2	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs emissions limit shall be based upon a rolling, 12-month summation.

* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

B. Operational Restrictions

1. The maximum annual coating and cleanup material usage for emissions unit R005 shall not exceed 1000 gallons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. 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 (b)];

- d. the number of gallons of each coating employed;
- e. the name and identification of each cleanup material employed;

- f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. 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 (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12 month period [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material]; and,
 - j. the total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].
- * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
- ** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.
2. The permittee shall collect and record the following information for each day for emissions unit R005:
- 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 organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all coatings and cleanup

Wittrock Woodworking & Mfg Inc

PTI Application: **14 4602**

August

Facility ID: **1431054014**

Emissions Unit ID: **R005**

materials, i.e., (d)/(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.]

3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. 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 deviation (excursion) reports which include the following information:
 - a. An identification of each hour during which the organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.
 - b. An identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

If no exceedances occurred during the reporting period then a report is required stating so

2. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R005 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation reports which identify any exceedance of the coating and cleanup material OC content or gallon usage limitations.

E. Testing Requirements

1. Compliance with the OC emission limitations in these terms and conditions shall be demonstrated by the required recordkeeping in T&C C.2.

2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the organic compound contents of the materials, including cleanup materials, employed in this emissions unit.

3. Compliance with the HAP limitations outlined in Term A.2.c shall be demonstrated by the record keeping in Term C.1.
4. Compliance with the gallon usage restriction in T&C B.1 shall be demonstrated by the record keeping in Term C.2.

F. Miscellaneous Requirements

1. If probable cause exists indicating any of these emissions units is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of the emissions unit shall be required to submit and implement a control program which will bring the emissions unit into compliance.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: isobutanol

TLV (ug/m3): 152

Maximum Hourly Emission Rate (lbs/hr): 1.42

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 163

MAGLC (ug/m3): 3619

Pollutant: toluene

TLV (ug/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 3.03

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 347

MAGLC (ug/m3): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is

Wittrock Woodworking & Mfg Inc

PTI Application: **14 4602**

August

Facility ID: **1431054014**

Emissions Unit ID: **R005**

hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
Wood coating line #6	OAC rule 3745-31-05	3.5 TPY OC
	OAC rule 3745-21-07(G)	8 pounds/hour OC 40 pounds/day OC
	OAC rule 3745-15-07	See T&C F.1

2. Additional Terms and Conditions

- 2.a All coating and cleanup materials employed in emissions unit R006 shall have an OC content limit of 7.0 pounds of OC per gallon.

Wittrock Woodworking & Mfg Inc

PTI Application: **14-1602**

August

Facility ID: **1431054014**

Emissions Unit ID: **R006**

- 2.b** Compliance with OAC rule 3745-31-05 shall be demonstrated by compliance with the air toxics policy and limited coating and cleanup material usage.
- 2.c** The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9* TPY for any single HAP as a rolling, 12-month summation and 24.9* TPY for any combination of HAPs as a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs emissions limits specified in the following table:

Wittro
PTI A₁
August 18, 1999

Emissions Unit ID: **R006**

<u>Month(s)</u>	<u>Maximum Allowable Single HAP Usage (Tons)</u>	<u>Maximum Allowable Combined HAP Usage(Tons)</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.7	16.7
1-9	7.5	18.8
1-10	8.3	20.8
1-11	9.2	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs emissions limit shall be based upon a rolling, 12-month summation.

* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

B. Operational Restrictions

1. The maximum annual coating and cleanup material usage for emissions unit R006 shall not exceed 1000 gallons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. 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 (b)];

- d. the number of gallons of each coating employed;
 - e. the name and identification of each cleanup material employed;
 - f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. 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 (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12 month period [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material]; and,
 - j. the total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].
- * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
- ** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.
2. The permittee shall collect and record the following information for each day for emissions unit R006:
- 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 organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and cleanup materials, in

Wittrock Woodworking & Mfg Inc

PTI Application: **14 4602**

August

Facility ID: **1431054014**

Emissions Unit ID: **R006**

pounds per day.

- e. The total number of hours the emissions unit was in operation.
- f. The average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(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.]

3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 deviation (excursion) reports which include the following information:
 - a. An identification of each hour during which the organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.
 - b. An identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

If no exceedances occurred during the reporting period then a report is required stating so

2. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R006 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation reports which identify any exceedance of the coating and cleanup material OC content or gallon usage limitations.

E. Testing Requirements

1. Compliance with the OC emission limitations in these terms and conditions shall be demonstrated by the required recordkeeping in T&C C.2.

2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the organic compound contents of the materials, including cleanup materials, employed in this emissions unit.

3. Compliance with the HAP limitations outlined in Term A.2.c shall be demonstrated by the record keeping in Term C.1.
4. Compliance with the gallon usage restriction in T&C B.1 shall be demonstrated by the record keeping in Term C.2.

F. Miscellaneous Requirements

1. If probable cause exists indicating any of these emissions units is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of the emissions unit shall be required to submit and implement a control program which will bring the emissions unit into compliance.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: isobutanol

TLV (ug/m³): 152

Maximum Hourly Emission Rate (lbs/hr): 1.42

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 163

MAGLC (ug/m³): 3619

Pollutant: toluene

TLV (ug/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 3.03

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 347

MAGLC (ug/m³): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is

Wittrock Woodworking & Mfg Inc

PTI Application: **14 4602**

August

Facility ID: **1431054014**

Emissions Unit ID: **R006**

hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
Wood coating line #7	OAC rule 3745-31-05	3.5 TPY OC
	OAC rule 3745-21-07(G)	8 pounds/hour OC 40 pounds/day OC
	OAC rule 3745-15-07	See T&C F.1

2. Additional Terms and Conditions

- 2.a All coating and cleanup materials employed in emissions unit R007 shall have an OC content limit of 7.0 pounds of OC per gallon.

- 2.b** Compliance with OAC rule 3745-31-05 shall be demonstrated by compliance with the air toxics policy and limited coating and cleanup material usage.
- 2.c** The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9* TPY for any single HAP as a rolling, 12-month summation and 24.9* TPY for any combination of HAPs as a rolling, 12-month summation.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the HAPs emissions limits specified in the following table:

Wittrock Woodworking & Mfg Inc

PTI Application: 14 4602

August

Facility ID: 1431054014

Emissions Unit ID: R007

<u>Month(s)</u>	<u>Maximum Allowable Single HAP Usage (Tons)</u>	<u>Maximum Allowable Combined HAP Usage(Tons)</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.7	16.7
1-9	7.5	18.8
1-10	8.3	20.8
1-11	9.2	22.9
1-12	9.9	24.9

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual HAPs emissions limit shall be based upon a rolling, 12-month summation.

* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

B. Operational Restrictions

1. The maximum annual coating and cleanup material usage for emissions unit R007 shall not exceed 1000 gallons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the entire facility:
 - a. the name and identification number of each coating, employed;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. 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 (b)];

75

Wittro

PTI A₁

August 18, 1999

Emissions Unit ID: **R007**

- d. the number of gallons of each coating employed;
- e. the name and identification of each cleanup material employed;

- f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - g. 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 (f)];
 - h. the number of gallons of each cleanup material employed;
 - i. the total individual HAP usage** for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12 month period [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material]; and,
 - j. the total combined HAP usage** from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].
- * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.
- ** This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.
2. The permittee shall collect and record the following information for each day for emissions unit R007:
- 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 organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly organic compound emission rate for all coatings and cleanup

77

Wittro

PTI A₁

August 18, 1999

Emissions Unit ID: **R007**

materials, i.e., (d)/(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.]

3. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. 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 deviation (excursion) reports which include the following information:
 - a. An identification of each hour during which the organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour.
 - b. An identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
 - c. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

If no exceedances occurred during the reporting period then a report is required stating so

2. The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R007 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit deviation reports which identify any exceedance of the coating and cleanup material OC content or gallon usage limitations.

E. Testing Requirements

1. Compliance with the OC emission limitations in these terms and conditions shall be demonstrated by the required recordkeeping in T&C C.2.

Wittrock Woodworking & Mfg Inc

PTI Application: **14 4602**

August

Facility ID: **1431054014**

Emissions Unit ID: **R007**

2. Formulation data or USEPA method 24 (for coatings) shall be used to determine the organic compound contents of the materials, including cleanup materials, employed in this emissions unit.

3. Compliance with the HAP limitations outlined in Term A.2.c shall be demonstrated by the record keeping in Term C.1.
4. Compliance with the gallon usage restriction in T&C B.1 shall be demonstrated by the record keeping in Term C.2.

F. Miscellaneous Requirements

1. If probable cause exists indicating any of these emissions units is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3745-15-07, the owner or operator of the emissions unit shall be required to submit and implement a control program which will bring the emissions unit into compliance.
2. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application.

The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: isobutanol

TLV (ug/m³): 152

Maximum Hourly Emission Rate (lbs/hr): 1.42

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 163

MAGLC (ug/m³): 3619

Pollutant: toluene

TLV (ug/m³): 188

Maximum Hourly Emission Rate (lbs/hr): 3.03

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 347

MAGLC (ug/m³): 4476

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is

hereby advised that the following changes to the process may be determined to be a "modification":

- 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 specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.