



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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

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MAILING ADDRESS:

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

11/5/2008

Certified Mail

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No	MODELING SUBMITTED

Mr. Ray Yoder, Jr.  
L&J Woodworking, Plant 2  
9235 Sneff Rd  
Dundee, OH 44624

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0285002001  
Permit Number: P0103756  
Permit Type: Initial Installation  
County: Wayne

Dear Permit Holder:

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

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

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

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

Sincerely,

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

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

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





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

L&J Woodworking, Plant 2 is a new facility which manufactures wood-based products and furniture. The facility plans to install and operate two paint spray booths. Emissions unit R001 for the application of stains and emissions unit R002 for the application of finish (i.e., sealer and topcoat).

L&J Woodworking has (will have) two plants, Plant 1 and Plant 2. The two plants meet all three criteria in Engineering Guide 58 that they are located on adjacent properties, both are under common control of the same individual, and have the same SIC codes. These two plants are considered as the "ONE FACILITY" for Title V purpose.

Plant 1 has four wood furniture coating spray booths, R001, R002, R003, and R004. This four emissions units were permitted under PTI No. 02-22946 with maximum VOC emissions limitation of 79.90 tons per year. Plant 1 also has stationary engines, which exempted from permit requirements, with maximum potential to emit of 2.98 tons per year of VOC emissions.

Plant 2 proposed to install two wood based products and furniture coating booths and a de minimis air make-up unit which has maximum 0.035 ton per year of VOC emissions

3. Facility Emissions and Attainment Status:

L&J Woodworking, Plant 2 is located in Dundee, Wayne County, an area designated as "attainment" for all criteria pollutants, such as ozone, sulfur dioxide, PM<sub>2.5</sub>, carbon monoxide and lead. L&J Woodworking is not a "Major Source" for a single hazardous air pollutant (HAP) and combined total HAPs. With the restriction of VOC emissions for Plant 1 by PTI No. 02-22946 and the proposed VOC emissions restriction contained in this permit for emissions units R001 and R002 in Plant 2, it will not be a major source for VOC emissions. Therefore, the requirements of Title V and Wood Furniture MACT, 40 CFR Part 63, subpart JJ, will not apply to them.

4. Source Emissions:

This FEPTIO contains terms and conditions that restrict the VOC emissions from emissions units R001 and R002 combined not to exceed 16.92 tons per year. Therefore, the total maximum VOC emissions from Plant 1 and Plant 2 combined will not exceed 100 tons per year, the major source threshold. L&J Woodworking Plant 2 is also required by this permit to track VOC emissions, keep records, and submit reports.

**Facility-Wide Emissions with restriction:**

		<b>VOC Emissions (tons/yr)</b>	<b>Single HAP Emissions (tons/yr)</b>	<b>Combined Total HAPs Emissions (tons/yr)</b>
<b>Plant 1</b>	R001 – R004 Combined	79.90	2.04	5.46
	Stationary Engines	2.98	0	0
<b>Plant 2</b>	R001 & R002	16.92	< 5.85	< 10.91
	Air Make-up Unit	0.035		
<b>Total:</b>		<b>99.835</b>	<b>&lt; 7.89</b>	<b>&lt; 16.37</b>

5. Conclusion:

The emission limitation contained in this FEPTIO are adequate to provide federally enforceable limitations to ensure that the applicable MACT and Title V thresholds will not be exceeded, as well as to avoid the requirements of the Wood Furniture BAT found in OAC 3745-21-15.

6. Please provide additional notes or comments as necessary:

Because the total VOC emissions from Plant 2 is less than 25 tons per year, L&J Woodworking Plant 2 is not subject to the requirements of Wood Furniture BAT studies found in OAC rule 3745-21-15, nor BAT Study for VOCs (threshold of 80 tons per year).

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC <sub>(R001 and R002)</sub>	16.92



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
L&J Woodworking, Plant 2

Issue Date: 11/5/2008

Permit Number: P0103756

Permit Type: Initial Installation

Permit Description: Initial installation of wood furniture coating booths, emissions units R001 and R002. VOC emissions are restricted to 16.92 tons per year.

Facility ID: 0285002001

Facility Location: L&J Woodworking, Plant 2  
9290 Winesburg Rd,  
Paint Twp., OH 44627

Facility Description: Nonupholstered Wood Household Furniture Manufacturing

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





**State of Ohio Environmental Protection Agency  
Division of Air Pollution Control**

**DRAFT**

**Air Pollution Permit-to-Install and Operate  
for  
L&J Woodworking, Plant 2**

Facility ID: 0285002001  
Permit Number: P0103756  
Permit Type: Initial Installation  
Issued: 11/5/2008  
Effective: To be entered upon final issuance  
Expiration: To be entered upon final issuance





**Air Pollution Permit-to-Install and Operate**  
for  
L&J Woodworking, Plant 2

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103756

**Facility ID:** 0285002001

**Effective Date:** To be entered upon final issuance

# Authorization

Facility ID: 0285002001

Application Number(s): A0035749

Permit Number: P0103756

Permit Description: Initial installation of wood furniture coating booths, emissions units R001 and R002. VOC emissions are restricted to 16.92 tons per year.

Permit Type: Initial Installation

Permit Fee: \$400.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 11/5/2008

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

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

This document constitutes issuance to:

L&J Woodworking, Plant 2  
9290 Winesburg Rd  
Paint Twp., OH 44627

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski  
Director



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103756

**Facility ID:** 0285002001

**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number: P0103756

Permit Description: Initial installation of wood furniture coating booths, emissions units R001 and R002. VOC emissions are restricted to 16.92 tons per year.

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

**Group Name: Wood Furniture Coating Operation**

<b>Emissions Unit ID:</b>	<b>R001</b>
Company Equipment ID:	stain booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R002</b>
Company Equipment ID:	finish booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103756

**Facility ID:** 0285002001

**Effective Date:** To be entered upon final issuance

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



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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

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



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

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103756

**Facility ID:** 0285002001

**Effective Date:** To be entered upon final issuance

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

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

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

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103756

**Facility ID:** 0285002001

**Effective Date:** To be entered upon final issuance

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103756

**Facility ID:** 0285002001

**Effective Date:** To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0103756

**Facility ID:** 0285002001

**Effective Date:** To be entered upon final issuance

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



**1. Emissions Unit Group - Wood Furniture Coating Operation: R001, R002,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
R001	manual wood furniture coating operation
R002	manual wood coating booth

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

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

a. d)(11).

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

a. b)(1)d, b)(2)d, d)(5), e)(1)a.vi, and f)(1)d

b) Applicable Emissions Limitations and/or Control Requirements

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

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



(2) Additional Terms and Conditions

- a. Each emissions unit becomes subject to OAC 3745-21-07 (G)(2) on any day when any photochemically reactive material, as defined in OAC 374521-01 (C)(5), is employed.

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

- b. On any day during which no photochemically reactive materials, as defined in OAC 3745-21-01(C)(5), are employed, the volatile organic compound (VOC) emissions from all the coatings shall not exceed the following:

- i. For emissions unit R001, 23.63 pounds per hour. [This limit is based upon the maximum application rate of 3.5 gallons per hour.]
- ii. For emissions unit R002, 23.55 pounds per hour. [This limit is based upon the maximum application rate of 5.0 gallons per hour.]

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

- c. The VOC content of each coating, as applied, shall not exceed the following:
- i. For emissions unit R001, 6.75 pounds per gallon; and
- ii. For emissions units R002, 4.71 pounds per gallon.
- d. The volatile organic compound (VOC) emissions from all the coatings and cleanup materials usage shall not exceed 16.92 tons per year, based upon a rolling, 12-month period, from emissions units R001 and R002,.

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

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



- (2) The permittee shall collect and record the following information each day for each emissions unit during which any photochemically reactive material is employed:
- a. The company identification for each coating and clean-up material employed;
  - b. The number of gallons of each coating and clean-up material employed minus the number of gallons of each coating and clean-up material recovered for disposal;
  - c. The OC content of each coating and clean-up material, in pounds OC per gallon;
  - d. The total OC emissions from all the coatings and clean-up materials, in pounds per day;
  - e. The total number of hours the emissions unit was in operation; and
  - f. The average hourly OC emission rate for all the coatings and clean-up materials, i.e., (d)/(e), in pounds per hour (average);
  - g. The VOC content of each coating and clean-up material, in pounds VOC per gallon; and
  - h. The total emissions rate for all coatings and clean-up materials, in pounds VOC per day.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of “photochemically reactive material” is based upon OAC rule 3745-21-01(C)(5).]

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

- (3) The permittee shall collect and record the following information each day for each emissions unit during which no photochemically reactive materials are employed:
- a. The company identification for each coating and clean-up material employed;
  - b. Documentation on whether or not each material employed (coating and clean-up) was a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
  - c. The VOC content of each coating, in lbs/gallon, as applied;
  - d. The number of gallons of each coating employed minus the number of gallons of each coating recovered for disposal;
  - e. The total VOC emissions from all the coatings employed, in lbs/day, i.e., sum of (c) times (d);
  - f. The total number of hours the emissions unit was in operation; and
  - g. The average hourly VOC emission rate for all the coatings, i.e., (e)/(f), in lbs/hr.



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

- (4) The permittee shall collect and record the following information each month for each emissions unit:
  - a. The number of gallons of each clean-up material employed minus the number of gallons of clean-up material recovered for disposal, when no photochemically reactive materials are employed;
  - b. The VOC content of each clean-up material, in lbs/gallon when no photochemically reactive materials are employed, ;
  - c. The total VOC emissions from all clean-up materials employed, in lbs/month, i.e., sum of (b) times (a), when no photochemically reactive material are employed; and
  - d. The actual VOC emissions from all the coatings and clean-up materials employed, in tons [i.e., {the summation of the daily VOC emissions, from d)(2)h, for the calendar month + the summation of the daily VOC emissions, from d)(3)e, for the calendar month + the monthly non-photochemically reactive clean-up material VOC emission from d)(4)c}, and divided by 2000 lbs/ton].

[Note: After the revision to OAC rule 3745-21-07 (G) is approved into the Ohio SIP, any reference to “no photochemically reactive materials” and section d)(2)h shall be voided.]

- (5) The permittee shall calculate and record the following information each month for emissions units R001 and R002 combined:
  - a. The total monthly VOC emissions from all the coatings and clean-up materials employed, in tons (calculated by summing the monthly VOC emissions for R001, and R002);
  - b. The rolling, 12-month VOC emissions from emissions units R001 and R002 combined, in tons.
- (6) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the overspray filters with any modifications deemed necessary by the permittee during the time period in which the overspray filters are utilized.
- (7) The permittee shall operate the overspray filters in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
- (8) The permittee shall conduct periodic inspections of the overspray filters to determine whether the filters are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each overspray filter shall be performed at a frequency that is based upon the recommendation of the manufacturer of the overspray filter, and the permittee shall maintain a copy of the manufacturer's



recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the overspray filter while the emissions unit is shut down and perform any needed maintenance and repair for the overspray filter to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

- (9) The permittee shall document each inspection of a overspray filter by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
- (10) In the event that the overspray filters are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the overspray filters shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the overspray filters are not operating in accordance with such requirements.
- (11) Modeling to demonstrate compliance with, the A Toxic Air Contaminant Statute, ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. 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 OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

e) Reporting Requirements

- (1) The permittee submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. each day during which OC emissions from the coatings and clean-up materials exceeded 8 pounds per hour and/or 40 pounds per day, when a photochemically reactive material was employed, and the actual OC emissions for each such day;
    - ii. each day during which the average VOC emissions from coatings employed in emissions unit R001 exceeded the 23.63 pounds per hour, when no photochemically reactive material was employed, and the actual average VOC emissions from emissions unit R001 for each such day;
    - iii. each day during which the average VOC emissions from coatings employed in emissions unit R002 exceeded the 23.55 pounds per hour, when no photochemically reactive material was employed, and the actual average VOC emissions from emissions unit R002 for each such day;



- iv. each day during which the VOC content for coatings employed in emissions unit R001 exceed the 6.75 pounds per gallon limit, and the actual VOC content for each such coating employed in emissions unit R001 for each such day;
  - v. each day during which the VOC content for coatings employed in emissions unit R002 exceed the 4.71 pounds per gallon limit, and the actual VOC content for each such coating employed in emissions unit R002 for each such day; and
  - vi. each month during which the rolling 12-month VOC emissions from emissions units R001 and R002 combined exceed 16.92 tons per year, and the actual VOC emissions for each such month.
- b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

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

- (2) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

- a. Emissions Limitation:

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

Applicable Compliance Method:



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

b. Emission Limitation:

For each day when photochemically reactive materials are not employed, the hourly VOC emissions from coatings shall not exceed:

- i. For emissions unit R001, 23.63 pounds per hour; and
- ii. For emissions unit R002, 23.55 pounds per hour.

Applicable Compliance Method:

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

c. Emission Limitation:

For each coating employed, the VOC content shall not exceed:

- i. For emissions unit R001, 6.75 pounds per gallon; and
- ii. For emissions unit R002, 4.71 pounds per gallon.

Applicable Compliance Method:

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

d. Emission Limitation:

16.92 tons of VOC emissions per year from all coatings and clean-up materials of emissions units R001 and R002 combined

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in section d)(5).

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

g) Miscellaneous Requirements

- (1) None.