State of Ohio Environmental Protection Agency

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Columbus, Ohio 43215

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

3/18/2009

Certified Mail

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

Ervin Yoder
Hill Finishing
32795 T.R. 219
Millersburg, OH 44654

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0616010089
Permit Number: P0089192
Permit Type: Renewal
County: Coshocton

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 Tribune. 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, Southeast District Office
2195 Front Street
Logan, OH 43138

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, Southeast District Office at (740)385-8501.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-SEDO; West Virginia

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description:

   Hill Finishing is an established wood furniture coating operation located at 32795 T.R. 219 in Millersburg, Ohio. This FEPTIO fulfills the Operating portion of the permitting process since the Installation permits were issued previously as 06-08152 issued 1/18/2007 for EUs P001, R001, and R002; and 06-08296 issued 7/24/2007 for EU R003. This FEPTIO wraps all these EUs into one permit. Emissions Unit P001 is an 80HP diesel engine, R001 (Sealer booth), R002 (Topcoat), and R003 (Stain booth).

3. Facility Emissions and Attainment Status:

   This facility is in Millcreek Township of Coshocton County which is in attainment for all criteria pollutants. The company had previously requested federally enforceable restrictions on VOC of less than 24.9 tons per year for R001, R002, and R003 combined to avoid being subject to 40 CFR Part 63 Subpart JJ and OAC 3745-77-01(W). With these VOC tonnage and HAP percentage restrictions, the facility cannot emit more than 10 tons per year for an individual HAP and 25 tons per year for all HAPs combined.

4. Source Emissions:

   This permit authorizes VOC emissions from each unit of up to 24.9 TPY per emissions unit as BAT, but no specific limits for individual HAPs were required because of the inherent limitation of application rates and HAP percentages preventing the facility from ever emitting more than 10 and 25 tons per year of individual and total HAPs. Total VOC emissions from the facility are limited to 24.9 tons per rolling, 12-month period for all emissions units, and limits on HAP content of coatings for all coating emissions units ensure that the major source thresholds related to HAPs are not exceeded.

5. Conclusion:

   The operational restrictions, emissions limits, monitoring and record keeping requirements in this permit are sufficient to limit the potential to emit for this unit to below Title V major source and MACT Subpart JJ thresholds. The federally enforceable limit of 24.9 tons per rolling, 12-month period for R001, R002 and R003, combined, as well as the limitations on HAP content of coatings, ensures that these federal rules do not apply.

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
VOC	24.9
HAPs (individual)	1.40
HAPs (total)	2.91

Coshocton County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Hill Finishing

Issue Date: 3/18/2009
Permit Number: P0089192
Permit Type: Renewal
Permit Description: Woodworking facility with diesel engine and three finishing booths
Facility ID: 0616010089
Facility Location: Hill Finishing
32795 T.R. 219,
Millersburg, OH 44654
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 Cara Cherry at Ohio EPA DAPC, Southeast District Office, 2195 Front Street or (740)385-8501. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install and Operate
for
Hill Finishing

Facility ID: 0616010089
Permit Number: P0089192
Permit Type: Renewal
Issued: 3/18/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Hill Finishing

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Authorization

Facility ID: 0616010089
Application Number(s): A0020438, A0020439, A0020440, A0020441
Permit Number: P0089192
Permit Description: Woodworking facility with diesel engine and three finishing booths
Permit Type: Renewal
Permit Fee: $0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 3/18/2009
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:

Hill Finishing
32795 T.R. 219
Millersburg, OH 44654

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, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

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

Authorization (continued)

Permit Number: P0089192
Permit Description: Woodworking facility with diesel engine and three finishing booths

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

Emissions Unit ID:	**P001**
Company Equipment ID:	Diesel Engine
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R001**
Company Equipment ID:	Sealer Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R002**
Company Equipment ID:	Topcoat Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R003**
Company Equipment ID:	Stain Booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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, Southeast 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.

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.

B. Facility-Wide Terms and Conditions

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

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

(1) None.

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

(1) 2.a) and b), 3.a) and b), 4.a)-c), 5.a), and 6.a) and b)

2. Applicable Emissions Limitations and/or Control Requirements

a) VOC emissions from all sources at the facility (R001, R002, R003 and miscellaneous equipment) shall be less than 24.9 tons per rolling, 12-month period.

b) The content of any single hazardous air pollutant (HAP)[1] in any coating or cleanup material shall not exceed 36 percent, by weight, of the VOC portion of the coating or cleanup material, as applied. The content of the combined HAPs in any coating or cleanup material shall not exceed 96 percent, by weight, of the VOC portion of the coating or cleanup material, as applied.

[1] A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office contact. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials.

3. Operational Restrictions

a) The weight of organic material in solvent evaporated (solvent usage, minus the number of gallons recovered for disposal) plus VOC emissions from all other sources, which is equivalent to total VOC emissions, shall be less than 24.9 tons during any rolling, 12-month period.

b) The permittee has sufficient monthly records of solvent usage and VOC emissions to begin calculating the rolling, 12-month summations upon final issuance of this permit.

4. Monitoring and/or Recordkeeping Requirements

a) The permittee shall collect and record the following information for each month:

(1) the company identification for each coating and cleanup material employed;

(2) the number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;

(3) the VOC content of each coating and cleanup material, in pounds per gallon; and

(4) the total VOC emissions rate for all the coatings and cleanup material, in tons per month;

(5) the total VOC emissions from all sources combined, in tons, for each month of operation;

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC emissions for each calendar month;

(6) beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC emissions.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

b) The permittee shall maintain records of the actual single HAP content and the combined HAPs content for each coating and cleanup material, in percent by weight of the VOC portion of the coating or cleanup material, as applied, (i.e., the pounds of HAP per gallon divided by the pounds of VOC per gallon).

c) The permittee shall maintain records of the HAPs content of each coating, as applied, in pounds per gallon and the actual single HAP content and the combined HAPs content for each coating and cleanup material, in percent by weight of the VOC portion of the coating or cleanup material, as applied, (i.e., the pounds of HAP per gallon divided by the pounds of VOC per gallon).

5. Reporting Requirements

a) The permittee shall submit quarterly deviation (excursion) reports that identify:

(1) all deviations (excursions) of the following emission limitations and operational restrictions 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:

a. 24.9 tons VOC during any rolling, 12 month period for the facility;

b. Any exceedance of the first 12 month(s) maximum allowable VOC emissions chart as detailed in 3.b);

c. Any single HAP content in any coating above 36 percent, by weight, of the VOC portion of the coating or cleanup material, as applied; and

d. Combined HAPs in any coating or cleanup material shall not exceed 96 percent, by weight, of the VOC portion of the coating or cleanup material, as applied;

(2) the probable cause of each deviation (excursion);

(3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

(4) 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, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

6. Testing Requirements

a) Compliance with the allowable emission limitations in 2.a) of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

VOC emissions from all sources at the facility (R001, R002, R003 and miscellaneous equipment) shall be less than 24.9 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in 4.a)(5) or (6) based on the record keeping as specified in 4.a).

b) USEPA Method 24 or formulation data shall be used to determine the VOC contents of the coatings and cleanup materials

C. Emissions Unit Terms and Conditions

1. P001, Diesel Engine

Operations, Property and/or Equipment Description:

80 HP John Deere Diesel Engine

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. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #06-08152 issued 1/18/07)	0.77 tons per year (tpy) of particulate emissions (PE). 0.16 lb/hr and 0.72 TPY of sulfur dioxide (SO2). 2.48 lbs/hr and 10.86 TPY of nitrogen oxides (NOx). 0.53 lb/hr and 2.34 TPY of carbon monoxide (CO). 0.20 lb/hr and 0.88 TPY of volatile organic compounds (VOC). Visible PE from the stack serving this emissions unit shall not exceed 10% opacity, as a six-minute average. The requirements of this rule also include

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		compliance with the requirements of OAC rule 3745-17-11(B)(5)(a).
b.	OAC rule 3745-17-11(B)(5)(a)	0.310 lb PE per million Btu of actual heat input.
c.	OAC rule 3745-18-06(G)	This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).
d.	OAC rule 3745-21-08(B)	See b)(2)a. below.
e.	OAC rule 3745-17-07(A)(1)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

c) Operational Restrictions

(1) The permittee shall only burn No.2 or diesel fuel, containing no greater than 0.5 percent sulfur by weight, in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the sulfur content of all fuels received for use in this emissions unit.

(2) For each day during which the permittee burns a fuel other than No. 2 or diesel fuel containing no greater than 0.5 percent sulfur by weight in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

e) Reporting Requirements

(1) 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.

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

(1) Compliance with the emission limitations specified in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

0.77 tpy of PE.

Applicable Compliance Methods:

Compliance with the annual emission limitation above shall be determined by multiplying 0.0022 lb/hp-hr, the emission factor specified in AP-42 "Compilation of Air Pollutant Emission Factors," Table 3.3-1 (10/96), by 80 HP, the power output rating of this unit, and by the maximum hours of operation, 8,760 hours/year, and dividing by 2,000 lbs/ton.

b. Emission Limitations:

0.16 lb/hr and 0.72 TPY of sulfur dioxide (SO2).

Applicable Compliance Methods:

Compliance with the hourly emission limitation above shall be determined by multiplying 0.00205 lb/hp-hr, the emission factor specified in AP-42 "Compilation of Air Pollutant Emission Factors," Table 3.3-1 (10/96), by 80 HP, the power output rating of this unit.

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate above by the maximum hours of operation, 8,760 hours/year, and dividing by 2,000 lbs/ton.

c. Emission Limitations:

2.48 lbs/hr and 10.86 TPY of nitrogen oxides (NOx)

Applicable Compliance Methods:

Compliance with the hourly emission limitation above shall be determined by multiplying 0.031 lb/hp-hr, the emission factor specified in AP-42 "Compilation

of Air Pollutant Emission Factors," Table 3.3-1 (10/96), by 80 HP, the power output rating of this unit.

If required, nitrogen oxides emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate above by the maximum hours of operation, 8,760 hours/year, and dividing by 2,000 lbs/ton.

d. Emission Limitations:

0.53 lb/hr and 2.34 TPY of carbon monoxide (CO)

Applicable Compliance Methods:

Compliance with the hourly emission limitation above shall be determined by multiplying 0.00668 lb/hp-hr, the emission factor specified in AP-42 "Compilation of Air Pollutant Emission Factors," Table 3.3-1 (10/96), by 80 HP, the power output rating of this unit.

If required, carbon monoxide emissions shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate above by the maximum hours of operation, 8,760 hours/year, and dividing by 2,000 lbs/ton.

e. Emission Limitations:

0.20 lb/hr and 0.88 TPY of volatile organic compounds (VOC)

Applicable Compliance Methods:

Compliance with the hourly emission limitation above shall be determined by multiplying 0.00251 lb/hp-hr, the emission factor specified in AP-42 "Compilation of Air Pollutant Emission Factors," Table 3.3-1 (10/96), by 80 HP, the power output rating of this unit.

If required, organic compound emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate above by the maximum hours of operation, 8,760 hours/year, and dividing by 2,000 lbs/ton.

f. Emission Limitation

Visible particulate emissions from the stack shall not exceed 10 percent opacity as a six-minute average.

Applicable Compliance Method

If required, visible particulate emissions shall be determined according to USEPA Method 9.

g. Emission Limitation:

0.310 lb PE per million Btu of actual heat input.

Applicable Compliance Method:

Compliance shall be demonstrated using the emission factor of 0.310 lb PE per million Btu of actual heat input from AP-42, Table 3.3-1 (Gasoline and Diesel Industrial Engines, 10/96).

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

g) Miscellaneous Requirements

(1) None.

2. R001, Sealer Booth

Operations, Property and/or Equipment Description:

Sealer Booth equipped with a dry filtration system, stack with exhaust fan and Kremlin HVLP spray pump/gun

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. b)(1)e., c)(3), d)(5)-(8), and e)(2)g.

(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)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #06-08152 issued 1/18/07)	Volatile organic compound (VOC) emissions from all coatings, cleanup materials and thinners employed in this emissions unit shall not exceed 19.70 lbs/hr and 24.9 tons per year. The requirements of this rule also include compliance with requirements of OAC rules 3745-31-05(D), 3745-17-11(C), and 3745-21-07(G). See b)(2)d. and b)(2)e. below.
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V and MACT Applicability	See B.2.a) and b).
c.	OAC rule 3745-17-11(C)	See b)(2)a. and b. below.
d.	OAC rule 3745-21-07(G)	Organic compound (OC) emissions from all coatings and cleanup materials shall not exceed 8 pounds per hour and 40 pounds per day.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)c. below.
e.	ORC 3704.03(F)(4)(c) and OAC rule 3745-114	See c)(3) and (d)(5)-(8) below.

(2) Additional Terms and Conditions

a. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

b. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

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

The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in d)(2), d)(3)(b), e)(2)(a), and f)(1)(a) shall be void.

d. The requirement to comply with this emission limitation 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, this emission limitation shall be effective every day the emissions unit is in operation.

e. The Isobutyl Acetate content of each coating shall not exceed 2.11 pounds per gallon, as applied.

c) Operational Restrictions

(1) The permittee shall install, operate, and maintain a dry particulate filter system for the surface coating operation in accordance with the manufacturer=s recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

(2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

(3) The permittee has requested to voluntarily limit this emissions unit's operating hours to no more than 161 hours per week to comply with the AToxic Air Contaminant Statute@, Ohio Revised Code (ORC) §3704.03(F).

d) Monitoring and/or Recordkeeping Requirements

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

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

b. the number of gallons of each coating and cleanup material employed minus the number of gallons of coating and/or cleanup material recovered for disposal;

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

d. the total OC emissions from all coatings and cleanup materials, in pounds per day;

e. the total number of hours this emissions unit is in operation;

f. the average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average);

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

h. the total emissions rate for all coatings and cleanup materials, in pounds VOC per day.

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

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, d)(1) will be voided entirely.]

(2) The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup materials are not employed in this emissions unit:

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

b. documentation that photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) was not used;

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 coating recovered for disposal;

e. the total VOC emissions from all coatings employed, in lbs/day, i.e., sum of (c) times (d);

f. the total number of hours this emissions unit is in operation; and

g. the average hourly VOC emission rate for all coatings, i.e., (e)/(f), in lbs/hr.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the records required by this section shall be kept on a daily basis with no reference to photochemically reactive materials and d)(2)(b) will be voided entirely.]

(3) The permittee shall collect and record the following information for each month for the emissions unit:

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

b. the number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;

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

d. the total emissions rate for all the coatings and cleanup material, in tons VOC per month.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

(4) The permittee shall calculate and record the total VOC emissions for all the coatings and cleanup materials employed, in tons, for each calendar year from this emissions unit.

(5) The federally enforceable permit-to-install and operate (FEPTIO) application for emissions unit R001 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The AToxic Air Contaminant Statute@, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled AReview of New Sources of Air Toxic Emissions, Option A@, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented

from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices@; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices@; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., A23@ hours per day and A7@ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV(ug/m^3)/10 \times 8/23 \times 5/7 = 4\ TLV(ug/m^3)/(23 \times 7) = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants emitted at 1 or more tons/year:

i. Toxic Contaminant: Toluene

TLV (mg/m^3): 75.36

Maximum Hourly Emission Rate (lbs/hr): 1.60

Predicted 1-Hour Maximum Ground Level Concentration (ug/m^3): 908.59

MAGLC (ug/m^3): 1794.33

ii. Toxic Contaminant: Xylene

TLV (mg/m^3): 434.19

Maximum Hourly Emission Rate (lbs/hr): 0.53

Predicted 1-Hour Maximum Ground Level Concentration (ug/m^3): 298.13

MAGLC (ug/m^3): 10337.91

The permittee has demonstrated that emissions of Toluene and Xylene from emissions unit R001 and R002 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute@, ORC 3704.03(F).

(6) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration@, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

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

(7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute@, ORC 3704.03(F);

a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

c. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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

(9) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(10) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer=s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer=s recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(11) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(12) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(13) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(14) The permittee shall maintain weekly records of the total number of hours this emissions unit was in operation, based upon the daily recordkeeping requirements in d)(1)e.

(15) The permittee shall maintain records of the isobutyl acetate content of each coating, as applied, in pounds per gallon and the actual HAP content and the combined HAP content for each coating and cleanup material, in percent by weight of the VOC portion of the coating or cleanup material, as applied, (i.e., the pounds of HAP per gallon divided by the pounds of VOC per gallon).

e) Reporting Requirements

(1) 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.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. each day during which OC emissions from the coatings and cleanup 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;

b. each day during which the average VOC emissions from the coatings exceeded the 19.70 pounds per hour, when no photochemically reactive material was employed, and the actual average VOC emissions for each such day;

c. the probable cause of each deviation (excursion);

d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions);

e. the magnitude and duration of each deviation (excursion);

f. all exceedances of the isobutyl acetate, single HAP, and/or combined HAPs content limitations specified above for each coating or cleanup material, as applied, and the actual isobutyl acetate and/or HAP contents of each such coating or cleanup material; and

g. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

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

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

(1) Compliance with the allowable emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in d)(1).

b. Emissions Limitation:

Volatile organic compound (VOC) emissions from all coatings, cleanup materials and thinners employed in this emissions unit shall not exceed 19.70 lbs/hr and 24.9 tons per year.

Applicable Compliance Method:

Compliance with the pound per hour emission limitation for VOC shall be determined by the daily values calculated in d)(2)g., based on the record keeping specified in d)(2)a.-f. Compliance with the annual tons per year emission limitation shall be determined by the value recorded in d)(4), based on the record keeping specified in d)(3).

(2) USEPA Method 24 or formulation data shall be used to determine the VOC contents of the coatings and cleanup materials.

g) Miscellaneous Requirements

(1) None.

3. R002, Topcoat Booth

Operations, Property and/or Equipment Description:

Topcoat Booth equipped with a dry filtration system, stack with exhaust fan and Kremlin HVLP spray pump/gun

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. b)(1)e., c)(3), d)(5) – (8), and e)(2)g.

(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)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #06-08152 issued 1/18/07)	Volatile Organic Compound (VOC) emissions from all coatings, cleanup materials and thinners employed in this emissions unit shall not exceed 19.70 lbs per hour and 24.9 tons per year. The requirements of this rule also include compliance with requirements of OAC rules 3745-31-05(D), 3745-17-11(C), and 3745-21-07(G). See b)(2)d. and b)(2)e). below
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V MACT Applicability	See B)2.a) and b).
c.	ORC 3704.03(F)(4)(c) and OAC Rule 3745-114	See b)(2)c., c)(4) d)(5) through d)(8) below.
d.	OAC 3745-17-11(C)	See b)(2)a. and b. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
e.	OAC rule 3745-21-07(G)	Organic compound (OC) emissions from all coatings and cleanup materials shall not exceed 8 pounds per hour and 40 pounds per day. See b)(2)c. below.
f.	ORC 3704.03(F)(4)(c) and OAC rule 3745-114	See c)(3) and (d)(5)-(8) below.

(2) Additional Terms and Conditions

a. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

b. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

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

The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in d)(2), d)(3)(b), e)(2)(a), and f)(1)(a) shall be void.

d. The requirement to comply with this emission limitation 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, this emission limitation shall be effective every day the emissions unit is in operation.

e. The Isobutyl Acetate content of each coating shall not exceed 2.11 pounds per gallon, as applied.

c) Operational Restrictions

(1) The permittee shall install, operate, and maintain a dry particulate filter system for the surface coating operation in accordance with the manufacturer=s recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by

the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

(2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

(3) The permittee has requested to voluntarily limit this emissions unit's operating hours to no more than 161 hours per week to comply with the AToxic Air Contaminant Statute@, Ohio Revised Code (ORC) §3704.03(F).

d) Monitoring and/or Recordkeeping Requirements

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

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

b. the number of gallons of each coating and cleanup material employed minus the number of gallons of coating and/or cleanup material recovered for disposal;

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

d. the total OC emissions from all coatings and cleanup materials, in pounds per day;

e. the total number of hours this emissions unit is in operation;

f. the average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average);

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

h. the total emissions rate for all coatings and cleanup materials, in pounds VOC per day.

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

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, d)(1) will be voided entirely.]

(2) The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup materials are not employed in this emissions unit:

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

b. documentation that photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) was not used;

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 coating recovered for disposal;

e. the total VOC emissions from all coatings employed, in lbs/day, i.e., sum of (c) times (d);

f. the total number of hours this emissions unit is in operation; and

g. the average hourly VOC emission rate for all coatings, i.e., (e)/(f), in lbs/hr.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the records required by this section shall be kept on a daily basis with no reference to photochemically reactive materials and d)(2)(b) will be voided entirely.]

(3) The permittee shall collect and record the following information for each month for the emissions unit:

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

b. the number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;

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

d. the total emissions rate for all the coatings and cleanup material, in tons VOC per month.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

(4) The permittee shall calculate and record the total VOC emissions for all the coatings and cleanup materials employed, in tons, for each calendar year from this emissions unit.

(5) The federally enforceable permit-to-install and operate (FEPTIO) application for emissions unit R002 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The AToxic Air Contaminant Statute@, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled AReview of New Sources of Air Toxic Emissions, Option A@, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units, (as determined from the raw materials

processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices@; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices@; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., A23@ hours per day and A7@ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV(ug/m^3)/10 \times 8/23 \times 5/7 = 4\ TLV(ug/m^3)/(23 \times 7) = MAGLC$$

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants emitted at 1 or more tons/year:

i. Toxic Contaminant: Toluene

TLV (mg/m^3): 75.36

Maximum Hourly Emission Rate (lbs/hr): 1.60

Predicted 1-Hour Maximum Ground Level Concentration (ug/m^3): 908.59

MAGLC (ug/m^3): 1794.33

ii. Toxic Contaminant: Xylene

TLV (mg/m^3): 434.19

Maximum Hourly Emission Rate (lbs/hr): 0.53

Predicted 1-Hour Maximum Ground Level Concentration (ug/m^3): 298.13

MAGLC (ug/m^3): 10337.91

The permittee has demonstrated that emissions of Toluene and Xylene from emissions unit R001 and R002 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing

agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute@, ORC 3704.03(F).

(6) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration@, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

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

(7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute@, ORC 3704.03(F);

a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F),

initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

c. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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

(9) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(10) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer=s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer=s recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(11) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(12) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(13) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated

according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(14) The permittee shall maintain weekly records of the total number of hours this emissions unit was in operation, based upon the daily recordkeeping requirements in d)(1)e.

(15) The permittee shall maintain records of the isobutyl acetate content of each coating, as applied, in pounds per gallon and the actual HAP content and the combined HAP content for each coating and cleanup material, in percent by weight of the VOC portion of the coating or cleanup material, as applied, (i.e., the pounds of HAP per gallon divided by the pounds of VOC per gallon).

e) Reporting Requirements

(1) 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.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. each day during which OC emissions from the coatings and cleanup 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;

b. each day during which the average VOC emissions from the coatings exceeded the 19.70 pounds per hour, when no photochemically reactive material was employed, and the actual average VOC emissions for each such day;

c. the probable cause of each deviation (excursion);

d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions);

e. the magnitude and duration of each deviation (excursion);

f. all exceedances of the isobutyl acetate, single HAP, and/or combined HAPs content limitations specified above for each coating or cleanup material, as applied, and the actual isobutyl acetate and/or HAP contents of each such coating or cleanup material; and

g. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

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

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

(1) Compliance with the allowable emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in d)(1).

b. Emissions Limitation:

Volatile organic compound (VOC) emissions from all coatings, cleanup materials and thinners employed in this emissions unit shall not exceed 19.70 lbs/hr and 24.9 tons per year.

Applicable Compliance Method:

Compliance with the pound per hour emission limitation for VOC shall be determined by the daily values calculated in d)(2)g., based on the record keeping specified in d)(2)a.-f. Compliance with the annual tons per year emission limitation shall be determined by the value recorded in d)(4), based on the record keeping specified in d)(3).

(2) USEPA Method 24 or formulation data shall be used to determine the VOC contents of the coatings and cleanup materials.

g) Miscellaneous Requirements

(1) None.

4. R003, Stain Booth

Operations, Property and/or Equipment Description:

Stain Booth equipped with a dry filtration system, stack with exhaust fan and Kremlin HVLP spray pump/gun.

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. b)(1)e., c)(3), d)(5)-(8), and e)(2)f.

(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)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #06-08296 issued 7/24/07)	Volatile organic compound (VOC) emissions from all coatings, cleanup materials and thinners employed in this emissions unit shall not exceed 13.99 lbs/hr and 24.9 tons per year. The requirements of this rule also include compliance with requirements of OAC rules 3745-31-05(D), 3745-17-11(C), and 3745-21-07(G). See b)(2)d. below.
b.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Title V and MACT Applicability	See B.2.a) and b).
c.	OAC rule 3745-17-11(C)	See b)(2)a. and b. below.
d.	OAC rule 3745-21-07(G)	Organic compound (OC) emissions from all coatings and cleanup materials shall not exceed 8 pounds per hour and 40 pounds per day.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)c. below.
e.	ORC 3704.03(F)(4)(c) and OAC rule 3745-114	See c)(3) and (d)(5)-(8) below.

(2) Additional Terms and Conditions

a. On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

b. The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

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

The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in d)(2), d)(3)(b), e)(2)(a), and f)(1)(a) shall be void.

d. The requirement to comply with this emission limitation 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, this emission limitation shall be effective every day the emissions unit is in operation.

c) Operational Restrictions

(1) The permittee shall install, operate, and maintain a dry particulate filter system for the surface coating operation in accordance with the manufacturer=s recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

(2) The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

(3) The permittee has requested to voluntarily limit this emissions unit's operating hours to no more than 157.5 hours per week to comply with the AToxic Air Contaminant Statute@, Ohio Revised Code (ORC) §3704.03(F).

d) Monitoring and/or Recordkeeping Requirements

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

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

b. the number of gallons of each coating and cleanup material employed minus the number of gallons of coating and/or cleanup material recovered for disposal;

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

d. the total OC emissions from all coatings and cleanup materials, in pounds per day;

e. the total number of hours this emissions unit is in operation;

f. the average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average);

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

h. the total emissions rate for all coatings and cleanup materials, in pounds VOC per day.

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

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, d)(1) will be voided entirely.]

(2) The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup materials are not employed in this emissions unit:

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

b. documentation that photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) was not used;

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 coating recovered for disposal;

e. the total VOC emissions from all coatings employed, in lbs/day, i.e., sum of (c) times (d);

f. the total number of hours this emissions unit is in operation; and

g. the average hourly VOC emission rate for all coatings, i.e., (e)/(f), in lbs/hr.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the records required by this section shall be kept on a daily basis with no reference to photochemically reactive materials and d)(2)(b) will be voided entirely.]

(3) The permittee shall collect and record the following information for each month for the emissions unit:

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

b. the number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;

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

d. the total emissions rate for all the coatings and cleanup material, in tons VOC per month.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

(4) The permittee shall calculate and record the total VOC emissions for all the coatings and cleanup materials employed, in tons, for each calendar year from this emissions unit.

(5) The federally enforceable permit-to-install and operate (FEPTIO) application for emissions unit R003 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The AToxic Air Contaminant Statute@, ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled AReview of New Sources of Air Toxic Emissions, Option A@, as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices@; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) AThreshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices@; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., A22.5@ hours per day and A7@ days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV(ug/m^3)/10 \times 8/22.5 \times 5/7 = 4\ TLV(ug/m^3)/(22.5 \times 7) = MAGLC$$

d. The following summarizes the results of dispersion modeling for the worst case toxic contaminant:

i. Compound: Stoddard Solvent

TLV (mg/m3): 572.6

Maximum Hourly Emission Rate (lbs/hr): 17.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 10947.31

MAGLC (ug/m3): 13714.98

The permittee has demonstrated that emissions of Stoddard Solvent from emissions unit R003 is calculated to be less than eighty percent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute@, ORC 3704.03(F).

(6) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration@, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

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

(7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the AToxic Air Contaminant Statute@, ORC 3704.03(F);

a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

c. the documentation of the initial evaluation of compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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

(9) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be

maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(10) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer=s recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer=s recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(11) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(12) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(13) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer=s recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(14) The permittee shall maintain weekly records of the total number of hours this emissions unit was in operation, based upon the daily recordkeeping requirements in d)(1)e.

e) Reporting Requirements

(1) 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.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. each day during which OC emissions from the coatings and cleanup 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;

b. each day during which the average VOC emissions from the coatings exceeded the 13.99 pounds per hour, when no photochemically reactive material was employed, and the actual average VOC emissions for each such day;

c. the probable cause of each deviation (excursion);

d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions);

e. the magnitude and duration of each deviation (excursion); and

f. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect.

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

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

(1) Compliance with the allowable emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in d)(1).

b. Emissions Limitation:

Volatile organic compound (VOC) emissions from all coatings, cleanup materials and thinners employed in this emissions unit shall not exceed 13.99 lbs/hr and 24.9 tons per year.

Applicable Compliance Method:

Compliance with the pound per hour emission limitation for VOC shall be determined by the daily values calculated in d)(2)g., based on the record keeping specified in d)(2)a.-f. Compliance with the annual tons per year emission limitation shall be determined by the value recorded in d)(4), based on the record keeping specified in d)(3).

(2) USEPA Method 24 or formulation data shall be used to determine the VOC contents of the coatings and cleanup materials.

g) Miscellaneous Requirements

(1) None.