



State of Ohio Environmental Protection Agency

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

4/28/2009

Robert Weaver
Cabinet Specialties, Inc
10738 Crisswell Rd
Fredericksburg, OH 44627

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0285000468
Permit Number: P0086414
Permit Type: Renewal
County: Wayne

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

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

Cc: Ohio EPA-NEDO

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



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

FINAL

**Air Pollution Permit-to-Install and Operate
for
Cabinet Specialties, Inc**

Facility ID: 0285000468
Permit Number: P0086414
Permit Type: Renewal
Issued: 4/28/2009
Effective: 4/28/2009
Expiration: 4/28/2019



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
 for
 Cabinet Specialties, Inc

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Authorization

Facility ID: 0285000468
Application Number(s): A0017143, A0017144, A0017145
Permit Number: P0086414
Permit Description: Renewal PTIO following PTIs 02-22843 and 02-22967.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 4/28/2009
Effective Date: 4/28/2009
Expiration Date: 4/28/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Cabinet Specialties, Inc
10738 Criswell Rd
Fredericksburg, OH 44627

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0086414
Permit Description: Renewal PTIO following PTIs 02-22843 and 02-22967.

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 #2 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P002 |
| Company Equipment ID: | Dust system #1 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | P003 |
| Company Equipment ID: | Diesel engine #1 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | R001 |
| Company Equipment ID: | sealer/topcoat booth |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |



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Final Permit-to-Install and Operate

Permit Number: P0086414

Facility ID: 0285000468

Effective Date: 4/28/2009

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.



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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0086414

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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.



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B. Facility-Wide Terms and Conditions



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Facility ID: 0285000468

Effective Date: 4/28/2009

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



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C. Emissions Unit Terms and Conditions



1. P001, Diesel engine #2

Operations, Property and/or Equipment Description:

175 HP John Deere stationary 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 02-22843]	0.38 lb/hr and 1.66 TPY of particulate emissions (PE)/PM less than 10 microns in diameter (PM-10). 0.36 lb/hr and 1.58 TPY of sulfur dioxide (SO ₂). See c)(1). 5.40 lbs/hr and 23.65 TPY of nitrogen dioxides (NO _x). 0.44 lb/hr and 1.93 TPY of organic compounds (OC). 1.16 lbs/hr and 5.08 TPY of carbon monoxide (CO). Visible particulate emissions from the stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include 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/mmBtu of particulate emissions.
c.	OAC rule 3745-17-07(A)(1)	The visible particulate emissions limitation required by this applicable rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	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).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall use only diesel fuel/number 2 fuel oil with a maximum sulfur content of 0.5 percent, by weight, for combustion in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall maintain documentation of the sulfur content of all fuels received.

(3) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.



e) If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

f) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day during which a fuel other than diesel fuel with a maximum sulfur content of 0.5 percent by weight was burned in this emissions unit and any corrective action(s) that were taken. Each report shall be submitted to the Ohio EPA Northeast District Office within 30 days of the deviation.

(2) The permittee shall submit semiannual written reports that:

- a. identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
- b. describe any corrective actions taken to minimize or eliminate the visible particulate emissions.

These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month periods.

(3) 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.

g) Testing Requirements

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

- a. Emission Limitation:
0.38 lb/hr of PM/PM-10

Applicable Compliance Method:

Compliance with the hourly emissions limitation above shall be determined by multiplying 0.0022 lb/hp-hr, the emission factor from AP-42, Table 3.3-1 (10/96), by 174.3 hp, the power output rating of this unit.

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.



- b. Emission Limitation:
1.66 TPY of PM/PM-10

Applicable Compliance Method:

The annual emissions limitation was developed by multiplying the short-term allowable particulate emission limitation (0.38 lb/hr) by the maximum allowable hours of operation (8760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

- c. Emission Limitation:
0.36 lb/hr of SO₂

Applicable Compliance Method:

Compliance with the hourly emissions limitation above shall be determined by multiplying 0.00205 lb/hp-hr, the emission factor from AP-42, Table 3.3-1 (10/96), by 174.3 hp, the power output rating of this unit.

- d. Emission Limitation:
1.58 TPY of SO₂

Applicable Compliance Method:

The annual emissions limitation was developed by multiplying the short-term allowable SO₂ emission limitation (0.36 lb/hr) by the maximum allowable hours of operation (8760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

- e. Emission Limitation:
5.40 lbs/hr of NO_x

Applicable Compliance Method:

Compliance with the hourly emissions limitation above shall be determined by multiplying 0.031 lb/hp-hr, the emission factor from AP-42, Table 3.3-1 (10/96), by 174.3 hp, the power output rating of this unit.

- f. Emission Limitation:
23.65 TPY of NO_x

Applicable Compliance Method:

The annual emissions limitation was developed by multiplying the short-term allowable NO_x emission limitation (5.40 lbs/hr) by the maximum allowable hours of operation (8760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

- g. Emission Limitation:
0.44 lb/hr of OC



Applicable Compliance Method:

Compliance with the hourly emissions limitation above shall be determined by multiplying 0.00251 lb/hp-hr, the emission factor from AP-42, Table 3.3-1 (10/96), by 174.3 hp, the power output rating of this unit.

- h. Emission Limitation:
1.93 TPY of OC

Applicable Compliance Method:

The annual emissions limitation was developed by multiplying the short-term allowable OC emission limitation (0.44 lb/hr) by the maximum allowable hours of operation (8760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

- i. Emission Limitation:
1.16 lbs/hr of CO

Applicable Compliance Method:

Compliance with the hourly emissions limitation above shall be determined by multiplying 0.00668 lb/hp-hr, the emission factor from AP-42, Table 3.3-1 (10/96), by 174.3 hp, the power output rating of this unit.

- j. Emission Limitation:
5.08 TPY of CO

Applicable Compliance Method:

The annual emissions limitation was developed by multiplying the short-term allowable OC emission limitation (1.16 lb/hr) by the maximum allowable hours of operation (8760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

- k. Emission Limitation:
Visible particulate emissions from the stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the visible particulate emission limitation shall be demonstrated based upon the visible emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

- l. Emission Limitation:
0.310 lb/mmBtu of particulate emissions

Applicable Compliance Method:

Compliance with the short term emission limitation above may be determined by the following equation:

$$(0.0022 \text{ lb/hp-hr}) / (\text{hp-hr}/7000 \text{ Btu}) * (10^6 \text{ Btu/mmBtu})$$



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where:

0.0022 lb/hp-hr, the emission factor from AP-42, Table 3.3-1 (10/96).

If required, compliance shall be demonstrated based upon an emission test performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

h) Miscellaneous Requirements

(1) None.



2. P002, Dust system #1

Operations, Property and/or Equipment Description:

Woodworking shop controlled by a large diameter cyclone and Aget baghouse, in series

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 02-22843]	See b)(2)a, b)(2)b, b)(2)e, and c)(1)-(3).
b.	OAC rule 3745-17-08(B)	None. See b)(2)c.
c.	OAC rule 3745-17-07(B)	None. See b)(2)d.
d.	OAC rule 3745-17-11 OAC rule 3745-17-07(A)	The emissions limitations specified by OAC rules 3745-17-11 and 3745-17-07(A) are less stringent than the emissions limitations established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. Particulate emissions (PE) shall not exceed 0.01 grain per dscf of exhaust gas, 0.38 pounds per hour and 1.91 tons per year from the dust collector exhaust.

b. There shall be no visible emissions from the dust collector exhaust.

c. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Wayne County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.



- d. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
 - e. Visible emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average during load-out.
- c) Operational Restrictions
- (1) The acceptable range for the pressure drop across the baghouse shall be based upon the manufacturer's specifications, until such time as any required performance testing is conducted and an alternative pressure drop range and/or limit is established.
 - (2) The dust collector shall be operated with a sufficient volumetric flow rate to eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.
 - (3) During any unloading of wood waste from the cyclone and baghouse hoppers into trailers, every attempt shall be made to reduce or control fugitive dust emissions by utilizing a three sided enclosure, minimizing the drop height to the trailer, utilizing a trailer with high side boards, utilizing telescoping or other type of tube on the discharge shoot during unloading process, or other fugitive dust reduction technique. The collection efficiency shall be considered adequate if there are no visible particulate emissions of fugitive dust from the during wood waste storage silo load-out in excess of 20% opacity, as a 3-minute average.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a weekly basis when the emissions are vented outdoors. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.



In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

NOTE: The exhaust from the dust collector for this emissions unit is currently vented back into the building. This is the normal operating mode for this emissions unit.

- (2) The permittee shall record in an operations log any time the three-side enclosure or telescoping tube for the unloading area was not in use when sawdust load out is in operation.
- (3) The permittee shall maintain copies of these records for a period of at least five years. Those records should be made available to Ohio EPA representatives to review during normal working hours.

e) Reporting Requirements

- (1) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the



- manufacturer and outside of the acceptable range following any required compliance demonstration;
- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in Aa@ (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in Aa@ where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in Aa@ where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (2) The permittee shall include the following information in the annual permit evaluation report:
- a. identify all days during which any visible particulate emissions were observed from the exhaust of the dust collector serving this emissions unit; and
 - b. describe any corrective actions taken to eliminate the visible particulate emissions.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations in Sections b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitations:
0.01 gr/dscf PE

Applicable Compliance Methods:
If required compliance with the PE limitations above shall be determined according Methods 1 - 5, 40 CFR 60, Appendix A.
 - b. Emission Limitation:
0.38 pound per hour of PE

Applicable Compliance Methods:
Compliance the annual allowable PE limitation may be determined by the following equation:



$$(0.055 \text{ gr/dscf}) \times (5,075 \text{ cfm}) \times (60 \text{ min/hr}) \times (8760 \text{ hr/yr}) \times (\text{lb}/7000 \text{ gr}) \times (\text{ton}/2000 \text{ lb}) \times (1-(0.999))$$

Where:

0.055 gr/dscf is the emission factor from AP-42, table 10.4-1 version 4/78; and
5,075 cfm is the dust collector flow rate;
99.9% is the manufacturer's guaranteed control efficiency.

- c. Emission Limitation:
1.91 tons per year of PE

The annual emissions limitation was developed by multiplying the short-term allowable PE emission limitation (0.38 lb/hr) by the maximum allowable hours of operation (8760 hours), then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation

- d. Emission Limitation:
Visible emissions of fugitive dust shall not exceed 20% opacity, as a 3-minute average during load-out.

Applicable Compliance Method:
Compliance with the visible fugitive emission limitation shall be determine by OAC rule 3745-17-03(B)(3), in accordance with Method 9, as set forth in 40 CFR Part 60, Appendix A.

- g) Miscellaneous Requirements

- (1) None.



3. P003, Diesel engine #1

Operations, Property and/or Equipment Description:

SDMO stationary diesel gen/set

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 02-22967]	3.79 lbs/hr and 16.61 TPY NOx See b)(2)f.
b.	OAC rule 3745-17-11	The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR 60, Subpart IIII.
c.	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule
d.	40 CFR 60, Subpart IIII	See b)(2)a – e.

(2) Additional Terms and Conditions

- a. Nitrogen oxide (NOx) emissions shall not exceed 9.2 g/KW-hr.
- b. Hydrocarbon (HC) emissions shall not exceed 1.3 g/KW-hr.
- c. Carbon monoxide (CO) emissions shall not exceed 11.4 g/KW-hr.
- d. Particulate (PM) emissions shall not exceed 0.54 g/KW-hr.



- e. Diesel fuel must meet the following nonroad, locomotive and marine fuel quality requirements:
 - i. Beginning October 1, 2010 -500 ppm maximum sulfur content
-either minimum cetane index of 40
or maximum aromatic content of 35
volume percent.
 - ii. Beginning October 1, 2010 -15 ppm maximum sulfur content
-either minimum cetane index of 40
or maximum aromatic content of 35
volume percent.
- f. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled OC (as HC), CO, PM and SO₂ emissions from this air contaminant source since the potential to emit for OC, CO, PM and SO₂ is less than ten tons per year.
- c) Operational Restrictions
 - (1) The emissions unit must be operated and maintained according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine. The permittee may only change those settings that are permitted by the manufacturer.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) For each shipment of diesel fuel received for burning in this emissions unit, the permittee shall retain documentation that the fuel meets the requirements for non-road, locomotive and marine fuel in 40 CFR 80.510. and section b)(2)e.
 - (2) The permittee shall maintain an operations log that documents all maintenance conducted on the engine.
 - (3) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission



incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (4) The permittee shall retain a copy of the initial notification required in section e)(1) on site and made available to the director or a representative upon request.
- (5) The permittee shall retain documentation that the engine meets the short term emissions standards on site and made available to the director or a representative upon request. This documentation includes the CARB certification for the 2005 model year for this same engine family.

e) Reporting Requirements

- (1) The permittee shall furnish to US EPA, Region V and the Ohio EPA, Northeast District Office a written initial notification that contains:
 - a. the name and address of the owner or operator;
 - b. the address of the emissions unit;
 - c. the engine information including make, model, engine family, serial number, model year, maximum engine power and engine displacement;
 - d. the date construction of the emissions unit commenced;
 - e. emissions control equipment; and
 - f. fuel used.

The notification shall be postmarked no later than 30 days after such date.

- (2) The permittee shall include the following information in the annual permit evaluation report:
 - a. identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. describe the cause of the emissions and any corrective actions taken to minimize or eliminate the visible particulate emissions;
 - c. identify any record which shows the fuel did not meet the requirements for non-road, locomotive and marine fuel; and
 - d. states that the engine was operated and maintained according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer.



- (3) The permittee shall notify the director (Ohio EPA, Northeast District Office) in writing of any record which shows the fuel did not meet the requirements for non-road, locomotive and marine fuel. The notification shall include a copy of such record and shall be sent to the director (the Ohio EPA, Northeast District Office) within 45 days after the deviation occurs.
 - (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- f) Testing Requirements
- (1) Compliance with the emission limitations specified in section b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
Nitrogen oxide (NOx) emissions shall not exceed 9.2 g/KW-hr and 3.79 pounds per hour.

Applicable Compliance Method:
Compliance shall be demonstrated by the California Air Resources Board Executive Order U-R-004-0207 which certifies the emissions of nitrogen oxide and non-methane hydrocarbon at 5.9 g/KW-hr.

Compliance with the hourly emission limitation above shall be determined by multiplying 5.9 g/KW-hr times 187 KW, the standby power output rating of this unit and dividing by 453.59 gram per pound.
 - b. Emission Limitation:
Nitrogen oxide (NOx) emissions shall not exceed 16.61 tons per year.

Applicable Compliance Method:
Compliance with the hourly emission limitation above shall be determined by multiplying 5.9 g/KW-hr by 187 KW, the standby power output rating of this unit, and by the maximum hours of operation per year (8760) and dividing by 453.59 gram per pound and 2000 pounds per ton.
 - c. Emission Limitation:
Hydrocarbon (HC) emissions shall not exceed 1.3 g/KW-hr.

Applicable Compliance Method:
Compliance shall be demonstrated by the California Air Resources Board Executive Order U-R-004-0207 which certifies the emissions of nitrogen oxide and non-methane hydrocarbon at 5.9 g/KW-hr and the combined HMHC+NOx CARB standard is 6.6 g/KW-hr.
 - d. Emission Limitation:
Carbon monoxide (CO) emissions shall not exceed 11.4 g/KW-hr.



Applicable Compliance Method:

Compliance shall be demonstrated by the California Air Resources Board Executive Order U-R-004-0207 which certifies the emissions of carbon monoxide and non-methane hydrocarbon at 0.6 g/KW-hr.

e. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.54 g/KW-hr.

Applicable Compliance Method:

Compliance shall be demonstrated by the California Air Resources Board Executive Order U-R-004-0207 which certifies the emissions of particulate emissions at 0.18 g/KW-hr.

f. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible particulate emission limitation shall be demonstrated based upon the visible emission observations performed in accordance with the procedures specified in 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

- (1) None.



4. R001, sealer/topcoat booth

Operations, Property and/or Equipment Description:

Wood furniture sealing/topcoating operation consisting of a booth with overspray filters and one, manual, air-assisted-airless spray pump/gun. Parts manually moved and air dried.

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

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

a. b)(1)b, c)(5)-(8), e)(2)c and e)(4)

(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 No. 02-22843]	See b)(2)a-c and c)(1).
b.	OAC rule 3745-114-01 ORC 3704.03(F)(4)(c)	See d)(5)-(8).

(2) Additional Terms and Conditions

a. The volatile organic compound (VOC) emissions shall not exceed 13.90 pounds per hour. [This limit is based upon the maximum application rate of 2.5 gallons per hour.]

b. The VOC content of each coating shall not exceed 5.56 pounds per gallon, as applied.

c. The VOC emissions from all the coatings and cleanup materials shall not exceed 61.28 tons per year.



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

- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
 - (2) The permittee shall collect and record the following information for each day:
 - a. The company identification for each coating or cleanup material employed;
 - b. The volatile organic compound (VOC) content of each coating, in lbs/gallon, as applied;
 - c. The number of gallons of each coating employed minus the number of gallons of each coating recovered for disposal;
 - d. The total VOC emissions from all the coatings employed, in lbs/day, i.e., sum of (b) times (c);
 - e. The total number of hours the emissions unit was in operation; and
 - f. The average hourly VOC emission rate for all the coatings, i.e., (d)/(e), in lbs/hr.
 - (3) The permittee shall collect and record the following information for each month for the emissions unit:
 - a. The number of gallons of each cleanup material employed minus the number of gallons of each cleanup material recovered for disposal;
 - b. The volatile organic compound (VOC) content, in lbs/gallon; and
 - c. The total VOC emissions from all cleanup materials employed, in lbs/month, i.e., sum of (a) times (b).
 - (4) The permittee shall calculate and record the total VOC emissions from all the coatings and cleanup materials employed, in tons per calendar year; [i.e., (the summation of the daily VOC emissions, from section d)(2)d, for the calendar year + the monthly cleanup material VOC emission from section d)(3)c divided by 2000 lbs/ton].
 - (5) The permit application for this emissions unit, R001, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The AToxic Air Contaminant Statute[®], ORC 3704.03(F), was applied to this emissions unit 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 "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists= (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists= (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

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

Compound: toluene
 TLV (mg/m3): 75.4
 Maximum Hourly Emission Rate (lbs/hr): 4.21
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,224
 MAGLC (ug/m3): 1,794

The permittee, has demonstrated that emissions of toluene, from emissions unit(s) R001, 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 "Toxic 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 unit(s), that could impact the parameters or values that were used in the



predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final permit 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 Toxic Air Contaminant Statute, ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), and documentation of any



determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

- (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 Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall notify the Director in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
- (2) The permittee submit quarterly deviation (excursion) reports that identify:
 - a. each day during which the average VOC emissions from the coatings exceeded the pounds per hour limitation, and the actual average VOC emissions for each such day; and
 - b. each day during which the VOC content of any coating exceeded the pounds per gallon limitation, and the actual VOC content of each such coating employed.
 - c. The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

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

- (3) The permittee shall also report in the Permit Evaluation Report (PER) a summary of the actual annual emissions of VOC from this emissions unit. The report shall include the emissions calculations documenting the VOC emissions.
- (4) The permittee shall include in the PER any changes made to a parameter or value used in the dispersion model (including the air toxic compounds emitted and the emission rate), that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect.
- (5) 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0086414

Facility ID: 0285000468

Effective Date: 4/28/2009



f) Testing Requirements

(1) Compliance with the allowable emission limitations in Section b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:
13.90 pounds VOC emissions per hour

Applicable Compliance Method:
Compliance with the hourly allowable VOC emission limitation shall be determined based upon the record keeping requirements specified in d)(2).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emissions Limitation:
61.28 tons of VOC emissions year from all the coatings and cleanup materials

Applicable Compliance Method:
Compliance with the annual allowable VOC emission limitation shall be demonstrated by the record keeping specified in d)(4).

c. Emissions Limitation:
5.56 pounds of VOC per gallon coating, as applied.

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

g) Miscellaneous Requirements

(1) None.