

Synthetic Minor Determination and/or Netting Determination

Permit To Install **01-08776**

A. Source Description

North American Wood Products is requesting to install an additional wood staining machine (R002) to their facility. The permittee currently operates one wood staining machine (R001) and will greatly reduce the use of this machine when R002 is installed. The permittee will restrict the annual use of coatings to 22,000 gallons per year for both R001 and R002.

B. Facility Emissions and Attainment Status

The emissions units at North American Wood Products have potential to emit as follows:

Emissions Unit(s)	Pollutant	Pre-Synthetic Minor (tons per year)	Synthetic Minor (tons per year)
R001 and R002	OC	486.82	60.02

C. Source Emissions

North American Wood Products has the potential to emit OC over Title V thresholds. The pre-synthetic minor emissions assume operation at 8760 hours per year. The synthetic minor emissions assumes a coating usage limit of 22,000 gallons per year.

D. Conclusion

The synthetic minor will effectively restrict OC emissions below Title V thresholds. The operational restrictions, record keeping and reporting requirements will ensure that compliance with this permit is achieved and maintained.



Street Address:

Mailing Address:

State of Ohio Environmental Protection Agency
Lazarus Gov. Center TEL: (614) 644-8020 FAX: (614) 644-2829

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
FRANKLIN COUNTY
Application No: 01-08776**

CERTIFIED MAIL

DATE: 9/30/2003

North American Wood Products
Paul Kidwell
1281 Edgehill Road
Columbus, OH 43212

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$300** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

CDO

Mid-Ohio Regional Planning Commission

FRANKLIN COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 01-08776 FOR AN AIR CONTAMINANT SOURCE FOR
NORTH AMERICAN WOOD PRODUCTS**

On 9/30/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **North American Wood Products**, located at **1281 Edgehill Road, Columbus, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-08776:

Wood staining process staining machine number 2.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417
[(614)728-3778]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 01-08776

Application Number: 01-08776
APS Premise Number: 0125042052
Permit Fee: **To be entered upon final issuance**
Name of Facility: North American Wood Products
Person to Contact: Paul Kidwell
Address: 1281 Edgehill Road
Columbus, OH 43212

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1281 Edgehill Road
Columbus, Ohio**

Description of proposed emissions unit(s):
Wood staining process staining machine number 2.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance

that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of Construction

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing

North American Wood Products

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operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

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North

PTI A

Emissions Unit ID: R001

Issued: To be entered upon final issuance

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	60.02

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Wood Staining Machine 1 (Terms in this permit supercede those identified in PTI 01-3168 issued on July 24, 1991.)	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emission shall not exceed 45.0 pounds per hour, not including cleanup.
	OAC rule 3745-31-05(D)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-21-07.
	OAC rule 3745-21-07 (G)	Total OC emissions from R001 and R002 shall not exceed 60.02 tons per year, including cleanup material, based on a rolling, 12-month summation of the monthly emissions. See B.1, B.2, B.3 and B.4 below. See A.1.2.a below.

2. Additional Terms and Conditions

- 2.a The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
- 2.b The hourly mass emission limitation in term A.1. was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The maximum organic compound (OC) content of any coating used in this emissions unit shall not exceed 5.0 pounds of OC per gallon, as applied.
2. The total maximum annual coating usage for emissions units R001 and R002 shall not exceed 22,000 gallons per rolling, 12-month summation of coating usage.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table for R001 and R002:

<u>Month</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1-1	1833 gallons
1-2	3666 gallons
1-3	5499 gallons
1-4	7332 gallons
1-5	9165 gallons
1-6	10,998 gallons
1-7	12,831 gallons
1-8	14,664 gallons
1-9	16,497 gallons
1-10	18,330 gallons
1-11	20,163 gallons
1-12	22,000 gallons

After the first twelve calendar months of operation following the issuance of this permit, compliance with the annual usage limitation shall be based on a cumulative rolling, 12-month summation of the monthly coating usage figures.

3. The maximum organic compound (OC) content of any cleanup material used in this emissions unit shall not exceed 6.7 pounds of OC per gallon, as applied.
4. The total maximum annual cleanup material usage for emissions units R001 and R002 shall not exceed 1500 gallons per rolling, 12-month summation of coating usage.
5. The permittee shall maintain a minimum stack height of twenty four (24) feet above ground for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.

C. Monitoring and/or Recordkeeping Requirements

North

PTI A

Emissions Unit ID: **R001**

Issued: To be entered upon final issuance

1. The permittee shall collect and record the following information each month:
 - a. the name and identification number of each coating and cleanup material, as applied each month;
 - b. the OC content of each coating, as applied (in pounds per gallon);

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- c. the OC content of each cleanup material, as applied (in pounds per gallon);
- d. the monthly coating usage for the emissions unit (in gallons);
- e. the monthly cleanup material usage for the emissions unit (in gallons);
- f. the monthly OC emissions from all coating and cleanup material (in pounds or tons);
- g. the rolling, 12-month summation of the monthly OC mass emissions;
- h. the rolling, 12-month summation of the monthly cleanup material usage; and
- i. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of coating usage for this emissions unit (in gallons).

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.

2. The permit to install for this emissions unit (R001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard Solvent

TLV (mg/m³): 525

Maximum Hourly Emission Rate (lbs/hr): 6.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 5747

MAGLC (ug/m³): 12,500

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will

North American Wood Products

PTI A

Issued

Facility ID: 0125042052

Emissions Unit ID: **R001**

still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:
 - a. the OC content limit for coatings used;

North

PTI A

Emissions Unit ID: **R001**

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- b. the rolling, 12-month limitation on coating usage and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage;

North

PTI A

Emissions Unit ID: R001

Issued: To be entered upon final issuance

- c. the OC content limit for cleanup materials used;
 - d. the rolling, 12-month limitation on cleanup material usage; and
 - e. the rolling, 12-month emission limitation for OC.
2. These deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.
 3. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of the terms and conditions of this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
Organic compound (OC) emissions shall not exceed 45.0 pounds per hour.

Applicable Compliance Method:
Compliance with the short term limitation shall be demonstrated by multiplying the maximum amount of coating used per hour (9 gallons per hour) by the OC content of the coating (in pounds OC per gallon).
 - b. Emission Limitation:
Total organic compound (OC) emissions from R001 and R002 shall not exceed 60.02 tons per year.

Applicable Compliance Method:
Compliance with the tons per year limitation shall be demonstrated by summing total OC emissions from coating and cleanup materials used in R001 and R002. OC emissions from coating shall be calculated by multiplying the annual amount of coating used (in gallons) by the OC content of the coating (in pounds OC per gallon). OC emissions from cleanup material shall be calculated by multiplying the annual amount of cleanup material used (in

Emissions Unit ID: **R001**

gallons) by the OC content of the cleanup material (in pounds OC per gallon).

- c. Gallon Usage Limitation:
The total maximum annual coating usage for emissions units R001 and R002 shall not exceed 22,000 gallons per rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance shall be demonstrated by record keeping requirements listed in term C.

F. Miscellaneous Requirements

None.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R002 - Wood Staining Machine 2	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emission shall not exceed 45.0 pounds per hour, not including cleanup. The requirements of this rule also include compliance with the requirements of OAC rules 3745-35-07(B) and 3745-21-07.
	OAC rule 3745-31-05(D)	Total OC emissions from R001 and R002 shall not exceed 60.02 tons per year, including cleanup material, based on a rolling, 12-month summation of the monthly emissions.
	OAC rule 3745-21-07 (G)	See B.1, B.2, B.3 and B.4 below. See A.1.2.a below.

2. Additional Terms and Conditions

- 2.a The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
- 2.b The hourly mass emission limitation in term A.1. was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

North

PTI A

Emissions Unit ID: R002

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B. Operational Restrictions

1. The maximum organic compound (OC) content of any coating used in this emissions unit shall not exceed 5.0 pounds of OC per gallon, as applied.
2. The total maximum annual coating usage for emissions units R001 and R002 shall not exceed 22,000 gallons per rolling, 12-month summation of coating usage.

To ensure enforceability during the first twelve calendar months of operation following the issuance of this permit, the permittee shall not exceed the coating usage levels specified in the following table for R001 and R002:

<u>Month</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1-1	1833 gallons
1-2	3666 gallons
1-3	5499 gallons
1-4	7332 gallons
1-5	9165 gallons
1-6	10,998 gallons
1-7	12,831 gallons
1-8	14,664 gallons
1-9	16,497 gallons
1-10	18,330 gallons
1-11	20,163 gallons
1-12	22,000 gallons

After the first twelve calendar months of operation following the issuance of this permit, compliance with the annual usage limitation shall be based on a cumulative rolling, 12-month summation of the monthly coating usage figures.

3. The maximum organic compound (OC) content of any cleanup material used in this emissions unit shall not exceed 6.7 pounds of OC per gallon, as applied.
4. The total maximum annual cleanup material usage for emissions units R001 and R002 shall not exceed 1500 gallons per rolling, 12-month summation of coating usage.
5. The permittee shall maintain a minimum stack height of twenty four (24) feet above ground for this emissions unit. All air contaminant emissions from this emissions unit shall be emitted through the stack.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. the name and identification number of each coating and cleanup material, as applied each month;
 - b. the OC content of each coating, as applied (in pounds per gallon);

North

PTI A

Emissions Unit ID: R002

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- c. the OC content of each cleanup material, as applied (in pounds per gallon);
- d. the monthly coating usage for the emissions unit (in gallons);
- e. the monthly cleanup material usage for the emissions unit (in gallons);
- f. the monthly OC emissions from all coating and cleanup material (in pounds or tons);
- g. the rolling, 12-month summation of the monthly OC mass emissions;
- h. the rolling, 12-month summation of the monthly cleanup material usage; and
- i. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of coating usage for this emissions unit (in gallons).

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative coating usage for each calendar month.

2. The permit to install for this emissions unit (R002) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Stoddard Solvent

TLV (mg/m³): 525

Maximum Hourly Emission Rate (lbs/hr): 6.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 5747

MAGLC (ug/m³): 12,500

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will

North

PTI A

Emissions Unit ID: **R002**

Issued: To be entered upon final issuance

still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
3. If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the following:
 - a. the OC content limit for coatings used;

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- b. the rolling, 12-month limitation on coating usage and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage;

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- c. the OC content limit for cleanup materials used;
 - d. the rolling, 12-month limitation on cleanup material usage; and
 - e. the rolling, 12-month emission limitation for OC.
2. These deviation (excursion) reports shall be submitted to the Ohio EPA Central District Office by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter. If no deviations occurred during a calendar quarter, the permittee shall submit a report which states that no deviations occurred during the calendar quarter.
 3. The permittee shall submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of the terms and conditions of this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitation:
Organic compound (OC) emissions shall not exceed 65.0 pounds per hour.

Applicable Compliance Method:
Compliance with the short term limitation shall be demonstrated by multiplying the maximum amount of coating used per hour (13 gallons per hour) by the OC content of the coating (in pounds OC per gallon).
 - b. Emission Limitation:
Total organic compound (OC) emissions from R001 and R002 shall not exceed 60.02 tons per year.

Applicable Compliance Method:
Compliance with the tons per year limitation shall be demonstrated by summing total OC emissions from coating and cleanup materials used in R001 and R002. OC emissions from coating shall be calculated by multiplying the annual amount of coating used (in gallons) by the OC content of the coating (in pounds OC per gallon). OC emissions from cleanup material shall be calculated by multiplying the annual amount of cleanup material used (in

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gallons) by the OC content of the cleanup material (in pounds OC per gallon).

- c. Gallon Usage Limitation:
The total maximum annual coating usage for emissions units R001 and R002 shall not exceed 22,000 gallons per rolling, 12-month summation of coating usage.

Applicable Compliance Method:

Compliance shall be demonstrated by record keeping requirements listed in term C.

F. Miscellaneous Requirements

None.