

Facility ID: 0238000104 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit P001](#)
- [Go to Part II for Emissions Unit P003](#)
- [Go to Part II for Emissions Unit R001](#)
- [Go to Part II for Emissions Unit R002](#)
- [Go to Part II for Emissions Unit R003](#)
- [Go to Part II for Emissions Unit R004](#)

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Facility ID: 0238000104 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
System #1. Saws and sanders controlled by a 4,800 cfm cyclone vented outside.	OAC rule 3745-31-05(A)(3)	Particulate emissions from the cyclone exhaust shall not exceed 1.2 lbs/hr.
	PTI 02-5548	
	OAC rule 3745-17-07(B)	Exempt due to location in non-Appendix A area.
	OAC rule 3745-17-08(B)	Exempt due to location in non-Appendix A area.
	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Visible emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

1. The cyclone shall be operated with a sufficient volumetric flow rate to minimize or eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.
2. The permittee shall operate the cyclone dust collector at all times the unit is in operation.

C. Monitoring and/or Record Keeping Requirements

1. None

D. Reporting Requirements

1. None

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of these Special Terms and Conditions shall be determined in accordance with the following methods:

Emission Limitation:
1.2 pounds of particulate matter per hour

Applicable Compliance Method:
Compliance with this emission limitation may be determined by the following equation:

$$PMHR = (0.03 \text{ gr/dscf}) \times (4,800 \text{ cfm}) \times (60 \text{ min/hr}) \times (\text{lb}/7000 \text{ gr})$$

Where:
PMHR= particulate matter emissions in pounds per hour; and
0.03 gr/dscf is the emission factor from AP-42, table 10.4-1 Particulate Emission Factor for Large Diameter

Cyclones in Woodworking Waste Collection Systems, version 2/80; and 4,800 cfm is the combined cyclone flow rate.

If required, compliance shall be determined according to OAC rule 3745-17-03(B)(10) (USEPA Methods 1 through 5 of 40 CFR Part 60, Appendix A).
Emission Limitation:
20% opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined according to OAC rule 3745-17-03(B)(1) (USEPA Method 9 of 40 CFR Part 60, Appendix A).

F. Miscellaneous Requirements

- 1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0238000104 Emissions Unit ID: P003 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
System #3. Saws, sanders and wood waste storage bin vent controlled by a primary cyclone and secondary, Miller Sheet Metal, 12,400 cfm baghouse.	OAC rule 3745-31-05(A)(3) PTI 02-13797	0.01 grain per dsfc of exhaust gas, 1.07 pounds per hour and 4.69 tons per year of particulate emissions.
	OAC rule 3745-17-07(B)	No visible emissions from the dust collector exhaust stack.
	OAC rule 3745-17-08(B)	Exempt due to location in non-Appendix A area.
	OAC rule 3745-17-11	Exempt due to location in non-Appendix A area.
	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

- 2. **Additional Terms and Conditions**
 - (a) None

B. Operational Restrictions

- 1. The pressure drop across the baghouse shall be maintained within either the manufacturer's recommended range of 0.5 to 6.0 inches of water while the emissions unit is in operation or the pressure drop range established during the most recent compliance inspection/emission test that determined the emissions unit was in compliance.
- 2. The baghouse shall be operated with a sufficient volumetric flow rate to minimize or eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design at all times the emissions unit is in operation.
- 3. The waste wood storage container vent shall be controlled by the baghouse at all times the woodworking shop is in operation.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The

permittee shall record the pressure drop across the baghouse on a daily basis.

2. The permittee shall perform weekly checks for any visible particulate emissions from the exhaust of the baghouse when the unit is vented outside. The presence or absence of any visible emissions from the exhaust of the baghouse shall be noted in an operations log. If any visible emissions are observed, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

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

3. The permittee shall maintain copies of the record of the daily pressure drop readings and the visible emissions log at the facility for a period of at least five years. Those records should be made available for Ohio EPA or their representatives to review during normal working hours.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above, and the corrective measures that were taken;
 - b. all periods of time during when the wood waste storage bin vent was not controlled by the baghouse, and the corrective measures that were taken; and
 - c. all instances when visible emissions from the baghouse exhaust were noted in the operations long, and the corrective measures that were taken.

Each deviation report shall include a statement of the corresponding emissions limits and/or operational restrictions established in this permit.

2. All deviation (excursion) reports shall be submitted in accordance with the General Terms and Conditions.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
0.01 gr/dscf and 1.07 pounds per hour of particulate matter emissions

Applicable Compliance Methods:

If required, compliance shall be determined according to OAC rule 3745-17-03(B)(10) (USEPA Methods 1 through 5 of 40 CFR Part 60, Appendix A).

Emission Limitation:

4.69 tons per year of particulate emissions

Applicable Compliance Methods:

Compliance with this emission limitation may be demonstrated by the following equation:

$$(0.01 \text{ gr/dscf}) \times (12,500 \text{ cfm}) \times (60 \text{ min/hr}) \times (8760 \text{ hr/yr}) \times (\text{lb}/7000 \text{ gr}) \times (\text{ton}/2000 \text{ lb}) = 4.69 \text{ TPY}$$

Where:

0.01 gr/dscf is the allowable emission rate; and

12,500 cfm is the baghouse flow rate.

Emission Limitation:

No visible emissions from the baghouse exhaust stack.

Applicable Compliance Methods:

Compliance with the no visible emission limit for the exhaust from the baghouse shall be determined using USEPA Method 22. (Although Method 22 generally applies to fugitive emissions, the visible/no visible emissions observation techniques of Test Method 22 also can be applied to ducted emissions.)

F. Miscellaneous Requirements

1. None

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Facility ID: 0238000104 Emissions Unit ID: R001 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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 - Coating spray booth #1 for the application of coatings to wood cabinets and trim, followed by a drying oven.	OAC rule 3745-31-05(A)(3) PTI 02-13739	See A.2.b and A.2.c below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2). See A.2.a. below.
	OAC rule 3745-35-07(B)	See A.2.c. through A.2.e. below.
	40 CFR 63, Subpart JJ	See A.2.f. below.
	OAC rule 3745-17-07	Visible particulate emissions from the stacks serving this emissions unit shall not exceed 20% opacity, except as provided by rule.
	OAC rule 3745-17-11	The particulate emissions from this emissions unit shall not exceed .551 lb/hr.

2. Additional Terms and Conditions

- (a) Each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and from photochemically reactive cleanup materials shall not exceed 8 pounds per hour and 40 pound per day. OC emissions from a cleanup material that is not a photochemically reactive material shall not be included in showing compliance with this limit.
Each day that no photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are employed, the OC emissions from coatings and cleanup materials shall not exceed 11.56 pounds per hour.
The OC emissions from all coatings and cleanup materials shall not exceed 9.27 tons per rolling, 12-month period.
The OC content of each coating shall not exceed 5.78 lbs per gallon, as applied.
Total emissions from R001, R002, R003 and R004, combined, shall not exceed the following limits:
 - i. 5.0 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation; and
 - ii. 12.0 tons per year of total combined hazardous air pollutants (HAPs), based upon a rolling, 12-month period.
The terms and conditions of this permit provide sufficient federally enforceable emissions limits and record keeping to limit the facility's potential-to-emit below 10 tons of each individual HAP and 25 tons of total, combined HAPs per rolling, 12-month period; thus, this facility is an area source for this MACT. If the rolling 12-month emissions of hazardous air pollutants (HAP) exceeds 10 tons per year of an individual HAP or 25 tons per year of total, combined HAPs, this facility becomes a major source and must comply with the requirements for a major source per 40 CFR Part 63, Subpart JJ within 365 days after the exceedance. [A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA, Northeast District Office.]

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
2. The annual coating usage in this emissions unit shall not exceed 3,000 gallons per rolling, 12-month period.

C. Monitoring and/or Record Keeping 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 that photochemically reactive materials [coatings or cleanup materials] are employed in this emissions unit:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the OC content of each coating and photochemically reactive cleanup material, in pounds OC per gallon;
 - d. the total emissions rate for all coatings and photochemically reactive cleanup materials, in pounds OC per day;
 - e. the total number of hours the emissions unit was in operation;
 - f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);
 - g. the company identification for each non-photochemically reactive cleanup material employed;
 - h. the number of gallons of each non-photochemically reactive cleanup material employed;
 - i. the OC content of each non-photochemically reactive cleanup material, in pounds OC per gallon; and

j. the total emissions rate for all non-photochemically reactive cleanup materials, in pounds OC per day.

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

3. The permittee shall collect and record the following information for each day that no photochemically reactive materials [coatings or cleanup materials] are employed in this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound (OC) content of each coating and cleanup material, in pounds OC per gallon;
 - d. the total OC emission rate for all coatings and cleanup materials, in pounds OC per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in lbs/hr.
4. The permittee shall collect and record the following information for this emissions unit each month:
 - a. the name and identification number of each coating, as applied;
 - b. the OC content of each coating, as applied, in pounds per gallon;
 - c. the single hazardous air pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - d. the total combined hazardous air pollutant (HAP) content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from c);
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup material employed;
 - g. the OC content of each cleanup material, as applied, in pounds per gallon;
 - h. the single HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - i. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from h);
 - j. the number of gallons of each cleanup material employed;
 - k. the total single HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month and in tons per rolling, 12-month period (for each HAP, [the sum of c. times e. for each coating plus the sum of h. times j. for each cleanup material for the month or the previous 12 months]/2000);
 - l. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month and in tons per rolling, 12-month period (for all HAPs, [the sum of d. times e. for each coating plus the sum of i. times j. for each cleanup material for the month or the previous 12 months]/2000); and
 - m. the total OC emissions from all coatings and cleanup materials employed, in tons per month and in tons per rolling, 12-month period ([the sum of b times e. for each coating plus the sum of g. times j. for each cleanup material for the month or the previous 12 months]/2000).

Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

5. The permittee shall record each month the rolling, 12-month summation of the emissions of each single HAP from emissions units R001, R002, R003 and R004 combined for the previous 12-month period.
6. The permittee shall record each month the rolling, 12-month summation of total, combined HAPs from emissions units R001, R002, R003 and R004 combined for the previous 12-month period.
7. The permittee shall record each month the rolling, 12-month summation of the total coating usage for emissions unit R001 for the previous 12-month period (based on the records kept according to Section C.4.e).

D. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) 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 shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. for the days during which a photochemically reactive material was employed, an identification of each day

during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day;

c. for the days during which no photochemically reactive material was employed, an identification of each day during which the average OC emissions from the coatings and cleanup materials exceeded 11.56 pounds per hour, and the actual average OC emissions for each such day;

d. an identification of each month during which the OC content of any coating exceeded 5.78 pounds per gallon, and the actual OC content of each such coatings employed;

e. all exceedances of the rolling 12-month emissions limitation for emissions units R001, R002, R003 and R004 for each single HAP;

f. all exceedances of the rolling, 12-month emissions limitation for emissions units R001, R002, R003 and R004 for total combined HAPs;

g. all exceedances of the rolling, 12-month emissions limitation for OC for this emissions unit; and

h. all exceedances of the rolling, 12-month coating usage limit for this emissions unit.

Each deviation report shall include a statement of the corresponding emissions limits and/or operational restrictions established in this permit.

3. The permittee shall also submit annual reports that summarize the following information:

a. the total emissions of OC from this emissions unit;

b. the emissions of each single HAP from this emissions unit and from emissions units R001, R002, R003 and R004, combined;

c. the emissions of total combined HAPs from this emissions unit and from emissions units R001, R002, R003 and R004, combined; and

d. the total coating usage for this emissions unit.

The reports shall include the emissions calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

4. All reports shall include the information required by the General Terms and Conditions.

E. Testing Requirements

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

Emissions Limitation:

8 pounds per hour of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be determined by the daily values calculated in C.2.f. based upon the record keeping specified in Section C.2.

Emissions Limitation:

40 pounds per day of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be determined by the daily values calculated in C.2.d. based upon the record keeping specified in Section C.2.

Emissions Limitation:

11.56 lbs OC emissions per hour for each day that no photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be determined by the daily values calculated in C.3.f. based on the record keeping specified in Section C.3.

Emissions Limitation:

9.27 tons of OC emissions per rolling, 12-month period from all coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.4.m based on the record keeping specified in Section C.4.

Emissions Limitations:

5.0 tons of each single HAP, based upon a rolling, 12-month summation for R001, R002, R003 and R004.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in Sections C.4.k. and C.5.

Emissions Limitations:

12.0 tons per year of total combined HAPs, based upon a rolling, 12-month summation for R001, R002, R003 and R004.

Applicable Compliance Method:

Compliance shall be based on the record keeping as specified in Sections C.4.l. and C.6.

Emissions Limitations:

20% opacity, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by performing visible emission readings in accordance with USEPA Test Method 9.

Emissions Limitations:

Particulate emissions shall not exceed .551 lb/hr.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by performing emission tests in accordance with USEPA Test Methods 1 through 5.

- 2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

- 1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F.

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Facility ID: 0238000104 Emissions Unit ID: R002 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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- 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.

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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 - Coating spray booth #2 for the application of stains to wood cabinets and trim.	OAC rule 3745-31-05(A)(3) PTI 02-13739	See A.2.a, A.2.b. and A.2.c below.
	OAC rule 3745-21-07(G)(2)	See A.2.a. below.
	OAC rule 3745-35-07(B)	See A.2.c. through A.2.e. below.
	40 CFR 63, Subpart JJ	See A.2.f. below.
	OAC rule 3745-17-07	Visible particulate emissions from the stacks serving this emissions unit shall not exceed 20% opacity, except as provided by rule.
	OAC rule 3745-17-11	The particulate emissions from this emissions unit shall not exceed .551 lb/hr.

2. Additional Terms and Conditions

- (a) The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA, Northeast District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

The organic compound (OC) emissions from coatings and cleanup materials shall not exceed 16.80 pounds per hour.

The OC content of each coating shall not exceed 6.72 pounds per gallon, as applied.

The OC emissions from all coatings and cleanup materials shall not exceed 10.68 tons per rolling, 12-month period.

Total emissions from R001, R002, R003 and R004, combined, shall not exceed the following limits:

- i. 5.0 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation; and
- ii. 12.0 tons per year of total combined hazardous air pollutants (HAPs), based upon a rolling, 12-month period.

The terms and conditions of this permit provide sufficient federally enforceable emissions limits and record keeping to limit the facility's potential-to-emit below 10 tons of each individual HAP and 25 tons

of total, combined HAPs per rolling, 12-month period; thus, this facility is an area source for this MACT. If the rolling 12-month emission of HAPs exceeds 10 tons per year of an individual HAP or 25 tons per year of total, combined HAPs, this facility becomes a major source and must comply with the requirements for a major source per 40 CFR Part 63, Subpart JJ, within 365 days after the exceedance. [A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA, Northeast District Office.]

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
2. The annual coating usage shall not exceed 3,000 gallons per rolling, 12-month period.

C. Monitoring and/or Record Keeping 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 and cleanup material employed and an indication of whether or not each coating and cleanup material is a photochemically reactive material;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound (OC) content of each coating and cleanup material, in lbs/gallon;
 - d. the total OC emission rate for all coatings and cleanup materials, in lbs/day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in lbs/hr.
3. The permittee shall collect and record the following information for emissions unit R002 each month:
 - a. the name and identification number of each coating, as applied;
 - b. the OC content of each coating, as applied, in pounds per gallon;
 - c. the single hazardous air pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - d. the total combined hazardous air pollutant (HAP) content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from c);
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup material employed;
 - g. the OC content of each cleanup material, as applied, in pounds per gallon;
 - h. the single HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - i. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from h);
 - j. the number of gallons of each cleanup material employed;
 - k. the total single HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month and in tons per rolling, 12-month period (for each HAP, [the sum of c. times e. for each coating plus the sum of h. times j. for each cleanup material for the month or the previous 12 months]/2000);
 - l. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month and in tons per rolling, 12-month period (for all HAPs, [the sum of d. times e. for each coating plus the sum of i. times j. for each cleanup material for the month or the previous 12 months]/2000); and
 - m. the total OC emissions from all coatings and cleanup materials employed, in tons per month and in tons per rolling, 12-month period ([the sum of b times e. for each coating plus the sum of g. times j. for each cleanup material for the month or the previous 12 months]/2000).

Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.
4. The permittee shall record each month the rolling, 12-month summation of the emissions of each single HAP from emissions units R001, R002, R003 and R004, combined, for the previous 12-month period.
5. The permittee shall record each month the rolling, 12-month summation of total, combined HAPs from emissions units R001, R002, R003 and R004, combined, for the previous 12-month period.
6. The permittee shall record each month the rolling, 12-month summation of the total coating usage from emissions unit R002 for the previous 12-month period (based on the records kept according to Section C.3).
7. 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 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:

- 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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, 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, then the permittee shall obtain a final permit to install prior to the change.

- 8. 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 notify the Director (Ohio EPA, Northeast District Office) 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 shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that a photochemically reactive material was employed in this emissions unit. The written notification shall specify the gallons of photochemically reactive material employed and a description of the corrective measures taken to prevent a reoccurrence. 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.
- 3. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average OC emissions from the coatings and cleanup materials exceeded 16.80 pounds per hour, and the actual average OC emissions for each such day;
 - b. an identification of each month during which the OC content of any coating exceeded 6.72 pounds per gallon, and the actual OC content of each such coatings employed;
 - c. all exceedances of the rolling 12-month emissions limitation for each single HAP from emissions units R001, R002, R003 and R004;
 - d. all exceedances of the rolling, 12-month emissions limitation for total combined HAPs from emissions units R001, R002, R003 and R004;
 - e. all exceedances of the rolling, 12-month emissions limitation for OC for this emissions unit; and
 - f. all exceedances of the rolling, 12-month coating usage limitation for this emissions unit.

Each deviation report shall include a statement of the corresponding emissions limits and/or operational restrictions established in this permit.

- 4. The permittee also shall submit annual reports that summarize the following information:
 - a. the total emissions of OC from this emissions unit;
 - b. the emissions of each single HAP from this emissions unit and from emissions units R001, R002, R003 and R004, combined;
 - c. the emissions of total combined HAPs from this emissions unit and from emissions units R001, R002, R003 and R004, combined; and
 - d. the total coating usage for this emissions unit.

The reports shall include the emissions calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

- 5. All reports shall include the information required in the General Terms and Conditions.

E. Testing Requirements

- 1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitation:
16.80 pounds OC emissions per hour from all coating and cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by the daily values calculated in C.2.f. based on the record keeping specified in Section C.2.

Emissions Limitation:

10.68 tons of OC emissions per rolling, 12-month period from all coatings and cleanup material

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in Section C.3.

Emissions Limitations:

5.0 tons of each single HAP, based upon a rolling, 12-month summation for R001, R002, R003 and R004.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in Sections C.3 and C.4.

Emissions Limitations:

12.0 tons per year of total combined HAPs, based upon a rolling, 12-month summation for R001, R002, R003 and R004.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in Sections C.3 and C.5.

Emissions Limitations:

20% opacity, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by performing visible emission readings in accordance with USEPA Test Method 9.

Emissions Limitations:

Particulate emissions shall not exceed .551 lb/hr.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by performing emission tests in accordance with USEPA Test Methods 1 through 5.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0238000104 Emissions Unit ID: R003 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
R003 - Coating spray booth #3 for the application of coatings to wood cabinets and trim, followed by a drying oven.	OAC rule 3745-31-05(A)(3) PTI 02-13739	See A.2.b and A.2.c below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2). See A.2.a. below.
	OAC rule 3745-35-07(B) 40 CFR 63, Subpart JJ	See A.2.c. through A.2.e. below. See A.2.f. below.
	OAC rule 3745-17-07	Visible particulate emissions from the stacks serving this emissions unit shall not exceed 20% opacity, except as provided by rule.

OAC rule 3745-17-11

The particulate emissions from this emissions unit shall not exceed .551 lb/hr.

2. Additional Terms and Conditions

- (a) Each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and from photochemically reactive cleanup materials shall not exceed 8 pounds per hour and 40 pound per day. OC emissions from a cleanup material that is not a photochemically reactive material shall not be included in showing compliance with this limit.
- Each day that no photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are employed, the OC emissions from coatings and cleanup materials shall not exceed 14.46 pounds per hour.
- The OC emissions from all coatings and cleanup materials shall not exceed 9.27 tons per rolling, 12-month period.
- The OC content of each coating shall not exceed 5.78 lbs per gallon, as applied.
- Total emissions from R001, R002, R003 and R004, combined, shall not exceed the following limits:
- i. 5.0 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation; and
 - ii. 12.0 tons per year of total combined hazardous air pollutants (HAPs), based upon a rolling, 12-month period.
- The terms and conditions of this permit provide sufficient federally enforceable emissions limits and record keeping to limit the facility's potential-to-emit below 10 tons of each individual HAP and 25 tons of total, combined HAPs per rolling, 12-month period; thus, this facility is an area source for this MACT. If the rolling 12-month emissions of hazardous air pollutants (HAP) exceeds 10 tons per year of an individual HAP or 25 tons per year of total, combined HAPs, this facility becomes a major source and must comply with the requirements for a major source per 40 CFR Part 63, Subpart JJ within 365 days after the exceedance. [A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA, Northeast District Office.]

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
2. The annual coating usage in this emissions unit shall not exceed 3,000 gallons per rolling, 12-month period.

C. Monitoring and/or Record Keeping 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 that photochemically reactive materials [coatings or cleanup materials] are employed in this emissions unit:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the OC content of each coating and photochemically reactive cleanup material, in pounds OC per gallon;
 - d. the total emissions rate for all coatings and photochemically reactive cleanup materials, in pounds OC per day;
 - e. the total number of hours the emissions unit was in operation;
 - f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);
 - g. the company identification for each non-photochemically reactive cleanup material employed;
 - h. the number of gallons of each non-photochemically reactive cleanup material employed;
 - i. the OC content of each non-photochemically reactive cleanup material, in pounds OC per gallon; and
 - j. the total emissions rate for all non-photochemically reactive cleanup materials, in pounds OC per day.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
3. The permittee shall collect and record the following information for each day that no photochemically reactive materials [coatings or cleanup materials] are employed in this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound (OC) content of each coating and cleanup material, in pounds OC per gallon;
 - d. the total OC emission rate for all coatings and cleanup materials, in pounds OC per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in lbs/hr.

4. The permittee shall collect and record the following information for this emissions unit each month:
- the name and identification number of each coating, as applied;
 - the OC content of each coating, as applied, in pounds per gallon;
 - the single hazardous air pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - the total combined hazardous air pollutant (HAP) content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from c);
 - the number of gallons of each coating employed;
 - the name and identification of each cleanup material employed;
 - the OC content of each cleanup material, as applied, in pounds per gallon;
 - the single HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
 - the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from h);
 - the number of gallons of each cleanup material employed;
 - the total single HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month and in tons per rolling, 12-month period (for each HAP, [the sum of c. times e. for each coating plus the sum of h. times j. for each cleanup material for the month or the previous 12 months]/2000);
 - the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month and in tons per rolling, 12-month period (for all HAPs, [the sum of d. times e. for each coating plus the sum of i. times j. for each cleanup material for the month or the previous 12 months]/2000); and
 - the total OC emissions from all coatings and cleanup materials employed, in tons per month and in tons per rolling, 12-month period ([the sum of b times e. for each coating plus the sum of g. times j. for each cleanup material for the month or the previous 12 months]/2000).
- Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.
5. The permittee shall record each month the rolling, 12-month summation of the emissions of each single HAP from emissions units R001, R002, R003 and R004 combined for the previous 12-month period.
6. The permittee shall record each month the rolling, 12-month summation of total, combined HAPs from emissions units R001, R002, R003 and R004 combined for the previous 12-month period.
7. The permittee shall record each month the rolling, 12-month summation of the total coating usage for emissions unit R001 for the previous 12-month period (based on the records kept according to Section C.4.e).
8. 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 still be 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:
- 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;
 - 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
 - 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.).
- 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 solely due to the emissions of any type of toxic air contaminant not previously emitted, 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, then the permittee shall obtain a final permit to install prior to the change.
9. 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 description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - 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 notify the Director (Ohio EPA, Northeast District Office) 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 shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. for the days during which no photochemically reactive material was employed, an identification of each day during which the average OC emissions from the coatings and cleanup materials exceeded 14.46 pounds per hour, and the actual average OC emissions for each such day;
 - d. an identification of each month during which the OC content of any coating exceeded 5.78 pounds per gallon, and the actual OC content of each such coatings employed;
 - e. all exceedances of the rolling 12-month emissions limitation for emissions units R001, R002, R003 and R004 for each single HAP;
 - f. all exceedances of the rolling, 12-month emissions limitation for emissions units R001, R002, R003 and R004 for total combined HAPs;
 - g. all exceedances of the rolling, 12-month emissions limitation for OC for this emissions unit; and
 - h. all exceedances of the rolling, 12-month coating usage limit for this emissions unit.

Each deviation report shall include a statement of the corresponding emissions limits and/or operational restrictions established in this permit.

3. The permittee shall also submit annual reports that summarize the following information:
 - a. the total emissions of OC from this emissions unit;
 - b. the emissions of each single HAP from this emissions unit and from emissions units R001, R002, R003 and R004, combined;
 - c. the emissions of total combined HAPs from this emissions unit and from emissions units R001, R002, R003 and R004, combined; and
 - d. the total coating usage for this emissions unit.

The reports shall include the emissions calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

4. All reports shall include the information required by the General Terms and Conditions.

E. Testing Requirements

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

Emissions Limitation:
8 pounds per hour of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.f. based upon the record keeping specified in Section C.2.

Emissions Limitation:
40 pounds per day of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.d. based upon the record keeping specified in Section C.2.

Emissions Limitation:
14.46 lbs OC emissions per hour for each day that no photochemically reactive materials are employed.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.3.f. based on the record keeping specified in Section C.3.

Emissions Limitation:
9.27 tons of OC emissions per rolling, 12-month period from all coatings and cleanup materials.

Applicable Compliance Method:
Compliance shall be determined by the value recorded in C.4.m based on the record keeping specified in Section C.4.

Emissions Limitations:
5.0 tons of each single HAP, based upon a rolling, 12-month summation for R001, R002, R003 and R004.

Applicable Compliance Method:
Compliance shall be based on the record keeping specified in Sections C.4.k. and C.5.

Emissions Limitations:

12.0 tons per year of total combined HAPs, based upon a rolling, 12-month summation for R001, R002, R003 and R004.

Applicable Compliance Method:

Compliance shall be based on the record keeping as specified in Sections C.4.I. and C.6.

Emissions Limitations:

20% opacity, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by performing visible emission readings in accordance with USEPA Test Method 9.

Emissions Limitations:

Particulate emissions shall not exceed .551 lb/hr.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by performing emission tests in accordance with USEPA Test Methods 1 through 5.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0238000104 Emissions Unit ID: R004 Issuance type: Final State Permit To Operate

[Go to the top of this document](#)

Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
R004 - Coating spray booth #4 for the application of coatings to wood cabinets and trim, followed by a drying oven.	OAC rule 3745-31-05(A)(3) PTI 02-13739	See A.2.b and A.2.c below. The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	See A.2.a. below.
	OAC rule 3745-35-07(B)	See A.2.c. through A.2.e. below.
	40 CFR 63, Subpart JJ	See A.2.f. below.
	OAC rule 3745-17-07	Visible particulate emissions from the stacks serving this emissions unit shall not exceed 20% opacity, except as provided by rule.
	OAC rule 3745-17-11	The particulate emissions from this emissions unit shall not exceed .551 lb/hr.

2. Additional Terms and Conditions

- (a) Each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and from photochemically reactive cleanup materials shall not exceed 8 pounds per hour and 40 pound per day. OC emissions from a cleanup material that is not a photochemically reactive material shall not be included in showing compliance with this limit.
Each day that no photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are employed, the OC emissions from coatings and cleanup materials shall not exceed 14.46 pounds per hour.
The OC emissions from all coatings and cleanup materials shall not exceed 12.16 tons per rolling, 12-

month period.

The OC content of each coating shall not exceed 5.78 lbs per gallon, as applied.

Total emissions from R001, R002, R003 and R004, combined, shall not exceed the following limits:

i. 5.0 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation; and

ii. 12.0 tons per year of total combined hazardous air pollutants (HAPs), based upon a rolling, 12-month period.

The terms and conditions of this permit provide sufficient federally enforceable emissions limits and record keeping to limit the facility's potential-to-emit below 10 tons of each individual HAP and 25 tons of total, combined HAPs per rolling, 12-month period; thus, this facility is an area source for this MACT. If the rolling 12-month emissions of hazardous air pollutants (HAP) exceeds 10 tons per year of an individual HAP or 25 tons per year of total, combined HAPs, this facility becomes a major source and must comply with the requirements for a major source per 40 CFR Part 63, Subpart JJ within 365 days after the exceedance. [A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA, Northeast District Office.]

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
2. The annual coating usage in this emissions unit shall not exceed 4,000 gallons per rolling, 12-month period.

C. Monitoring and/or Record Keeping 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 that photochemically reactive materials [coatings or cleanup materials] are employed in this emissions unit:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the OC content of each coating and photochemically reactive cleanup material, in pounds OC per gallon;
 - d. the total emissions rate for all coatings and photochemically reactive cleanup materials, in pounds OC per day;
 - e. the total number of hours the emissions unit was in operation;
 - f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);
 - g. the company identification for each non-photochemically reactive cleanup material employed;
 - h. the number of gallons of each non-photochemically reactive cleanup material employed;
 - i. the OC content of each non-photochemically reactive cleanup material, in pounds OC per gallon; and
 - j. the total emissions rate for all non-photochemically reactive cleanup materials, in pounds OC per day.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
3. The permittee shall collect and record the following information for each day that no photochemically reactive materials [coatings or cleanup materials] are employed in this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound (OC) content of each coating and cleanup material, in pounds OC per gallon;
 - d. the total OC emission rate for all coatings and cleanup materials, in pounds OC per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in lbs/hr.
4. The permittee shall collect and record the following information for this emissions unit each month:
 - a. the name and identification number of each coating, as applied;
 - b. the OC content of each coating, as applied, in pounds per gallon;
 - c. the single hazardous air pollutant (HAP) content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
 - d. the total combined hazardous air pollutant (HAP) content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from c);
 - e. the number of gallons of each coating employed;

- f. the name and identification of each cleanup material employed;
- g. the OC content of each cleanup material, as applied, in pounds per gallon;
- h. the single HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
- i. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from h);
- j. the number of gallons of each cleanup material employed;
- k. the total single HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month and in tons per rolling, 12-month period (for each HAP, [the sum of c. times e. for each coating plus the sum of h. times j. for each cleanup material for the month or the previous 12 months]/2000);
- l. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month and in tons per rolling, 12-month period (for all HAPs, [the sum of d. times e. for each coating plus the sum of i. times j. for each cleanup material for the month or the previous 12 months]/2000); and
- m. the total OC emissions from all coatings and cleanup materials employed, in tons per month and in tons per rolling, 12-month period ([the sum of b times e. for each coating plus the sum of g. times j. for each cleanup material for the month or the previous 12 months]/2000).

Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

- 5. The permittee shall record each month the rolling, 12-month summation of the emissions of each single HAP from emissions units R001, R002, R003 and R004 combined for the previous 12-month period.
 - 6. The permittee shall record each month the rolling, 12-month summation of total, combined HAPs from emissions units R001, R002, R003 and R004 combined for the previous 12-month period.
 - 7. The permittee shall record each month the rolling, 12-month summation of the total coating usage for emissions unit R001 for the previous 12-month period (based on the records kept according to Section C.4.e).
 - 8. 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 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:
 - 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.).

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 solely due to the emissions of any type of toxic air contaminant not previously emitted, 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, then the permittee shall obtain a final permit to install prior to the change.
 - 9. 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 notify the Director (Ohio EPA, Northeast District Office) 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 shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. for the days during which a photochemically reactive material was employed, an identification of each day

during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day;

c. for the days during which no photochemically reactive material was employed, an identification of each day during which the average OC emissions from the coatings and cleanup materials exceeded 14.46 pounds per hour, and the actual average OC emissions for each such day;

d. an identification of each month during which the OC content of any coating exceeded 5.78 pounds per gallon, and the actual OC content of each such coatings employed;

e. all exceedances of the rolling 12-month emissions limitation for emissions units R001, R002, R003 and R004 for each single HAP;

f. all exceedances of the rolling, 12-month emissions limitation for emissions units R001, R002, R003 and R004 for total combined HAPs;

g. all exceedances of the rolling, 12-month emissions limitation for OC for this emissions unit; and

h. all exceedances of the rolling, 12-month coating usage limit for this emissions unit.

Each deviation report shall include a statement of the corresponding emissions limits and/or operational restrictions established in this permit.

3. The permittee shall also submit annual reports that summarize the following information:

a. the total emissions of OC from this emissions unit;

b. the emissions of each single HAP from this emissions unit and from emissions units R001, R002, R003 and R004, combined;

c. the emissions of total combined HAPs from this emissions unit and from emissions units R001, R002, R003 and R004, combined; and

d. the total coating usage for this emissions unit.

The reports shall include the emissions calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

4. All reports shall include the information required by the General Terms and Conditions.

E. Testing Requirements

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

Emissions Limitation:

8 pounds per hour of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be determined by the daily values calculated in C.2.f. based upon the record keeping specified in Section C.2.

Emissions Limitation:

40 pounds per day of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be determined by the daily values calculated in C.2.d. based upon the record keeping specified in Section C.2.

Emissions Limitation:

14.46 lbs OC emissions per hour for each day that no photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be determined by the daily values calculated in C.3.f. based on the record keeping specified in Section C.3.

Emissions Limitation:

12.16 tons of OC emissions per rolling, 12-month period from all coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.4.m based on the record keeping specified in Section C.4.

Emissions Limitations:

5.0 tons of each single HAP, based upon a rolling, 12-month summation for R001, R002, R003 and R004.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in Sections C.4.k. and C.5.

Emissions Limitations:

12.0 tons per year of total combined HAPs, based upon a rolling, 12-month summation for R001, R002, R003 and R004.

Applicable Compliance Method:

Compliance shall be based on the record keeping as specified in Sections C.4.l. and C.6.

Emissions Limitations:

20% opacity, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by performing visible emission readings in accordance with USEPA Test Method 9.

Emissions Limitations:

Particulate emissions shall not exceed .551 lb/hr.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by performing emission tests in accordance with USEPA Test Methods 1 through 5.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F.