Facility ID: 0238000208 Issuance type: Final State Permit To Operate

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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.

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

**Facility ID: 0238000208 Emissions Unit ID: R002 Issuance type: Final State Permit To Operate**

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**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.

| Operations, Property, and/or Equipment | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| Wood furniture sealing and top finishing operation using one of three airless spray guns in a booth equipped with dry overspray filters. Pieces are manually moved and air dried. | OAC rule 3745-31-05(A)(3) (PTI 02-21515mod1 Effective 2/16/2006) | See A.2.b, A.2.c, A.2.d and B.1 below.<br><br>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 3745-31-05(C) | See A.2.c and B.2 below. |
| | OAC rule 3745-17-11(C) | See A.2.e below. |

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 photochemically reactive cleanup material and from photochemically reactive materials shall not exceed 8 pounds per hour and 40 pound per day. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

   The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included shall be void.
   Each day that photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)]are not employed, the volatile organic compound (VOC) emissions from coatings shall not exceed 16.4 pounds per hour. This limit is based upon the maximum application rate of 2.75 gallons per hour.

   The requirement to comply with this emissions limitation only on days photochemically reactive coating or clean up material are employed shall cease on the date the U.S. EPA approves revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, this emissions limitation shall be effective every day the emissions unit is in operation.
   The VOC emissions from all coatings and cleanup materials from shall not exceed 40.0 tons per year, as a rolling, 12-month summation.
   The VOC content of coatings shall not exceed 5.97 pounds per gallon, as applied.
   The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

B. **Operational Restrictions**

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

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

2. The maximum coating and clean up material usage for this emissions unit shall not cause emissions to exceed

40.0 tons of VOC per rolling, 12-months. The permittee has existing coating and clean up material usage records such that there is no need for first year monthly VOC emission limitations.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;
b. a description of each/any problem identified and the date it was corrected;
c. a description of any maintenance and repairs performed; and
d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

2. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup material 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 minus the number of gallons of coating and/or cleanup material recovered for disposal;

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 VOC content of each coating and photochemically reactive cleanup material, in pounds VOC per gallon; and

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

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

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

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

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

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

c. the volatile organic compound (VOC) content of each coating, in lbs/gallon as applied;

d. the number of gallons of each coating employed minus the number of gallons of coating recovered for disposal;

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

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

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

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

4. The permittee shall collect and record the following information for each month for the emissions unit:

   a. the number of gallons of each non-photochemically reactive cleanup material employed minus the number of gallons of cleanup material recovered for disposal;

   b. the volatile organic compound (VOC) content of each non-photochemically cleanup material, in lbs/gallon;

   c. the total VOC emissions from all non-photochemically reactive cleanup materials employed, in lbs/month, i.e., sum of (b) times (a); and

   d. the actual VOC emissions from all coatings and cleanup materials for the previous, 12-month period [i.e., sum of the daily VOC emissions (terms C.2.h + C.3.e) and the monthly non-photochemically reactive cleanup material VOC emission (term C.4.c) for the previous, 12-month period].

   [Note: Records of nonphotochemically reactive cleanup material shall be recorded monthly according to section C.4 above. After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding any reference to "nonphotochemically reactive". Section 4.b shall be void. Information from section C.2.h shall be kept in section C.3.e.]

5. The permit to install for this emissions unit and emissions units R001 and R002, combined, were evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant for emissions unit R001 and R002, combined:

   Compound: isobutyl acetate

   TLV (mg/m3): 712

   Maximum Hourly Emission Rate (lbs/hr): 5.80

   Predicted 1-Hour Maximum Ground-Level
   Concentration (ug/m3): 12,559

   Adjusted MAGLC (ug/m3): 16,968

6. 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(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.

7. 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 quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter was not in service when the emissions unit was in operation.

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

   a. for the days during which a photochemically reactive material was employed, each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour

and/or 40 pounds per day, and the actual OC emissions for each such incidence;

b. for the days during which a photochemically reactive material was not employed, each day during which the average VOC emissions from the coatings exceeded the pounds per hour limitation specified above, and the actual average VOC emissions for each such day;

c. each day during which the VOC content of any coating exceeded the pounds per gallon limitation specified above and the actual VOC content of each such coatings employed;

d. any exceedence of the annual VOC* emission limitation, as a rolling, 12-month summation, and the actual VOC emissions during such period; and

*based upon the premise that 100% of the solvent in the coating and clean up material employed is emitted.

The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding section D.2.a and the opening phrase of section D.2.b that references photochemically reactive material.]

3. The permittee shall also submit annual reports that summarize the emissions of VOC from this emissions unit.

The reports shall include the emissions calculations, shall be submitted by January 31 of each year, and shall cover the previous calendar year.

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:
16.4 pounds VOC emissions per hour for each day that photochemically reactive materials are not employed.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.3.g. based on the record keeping specified in Section C.3.
Emissions Limitation:
40.0 tons of VOC emissions per year from all coatings and cleanup material from R002

Applicable Compliance Method:
Compliance shall be determined by the value recorded in C.4.d based on the record keeping as specified in Section C.2, C.3 and C.4.
Emissions Limitation:
5.97 pounds of VOC per gallon coating, as applied.

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

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding sections E.1.a and E.1.b, by voiding the reference to photochemically reactive materials in section E.1.c and by voiding the reference to section C.2 in section E.1.d.]

F. **Miscellaneous Requirements**

1. In accordance with the provisions of OAC rule 3745-31-05(D), the following terms and conditions of this permit to install are federally enforceable: A-F, except C.5, C.6, and C.7