Ohio Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

11/29/2010

Mr. Scott Gasser
Mastercraft Ind
6960 C.R. 672
Millersburg, OH 44654

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0238002003
Permit Number: P0106821
Permit Type: Initial Installation
County: Holmes

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Holmes County Hub. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-NEDO

Permit Strategy Write-Up

1. Check all that apply:
   X
   ___ Synthetic Minor Determination

   ___ Netting Determination

2. Source Description: Two spray booths for the manual application of stains & dyes to wood furniture

3. Facility Emissions and Attainment Status: Facility has requested VOC and HAP emission limitations to avoid MACT Subpart JJ & Title V

4. Source Emissions: Coatings & clean up materials contain HAP/VOC. Both spray booths are equipped with filters for particulate control.

5. Conclusion: Facility's request to limit VOC will subsequently maintain HAP emissions below major source thresholds

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
VOC	24.0
Single HAP	9.9
Combined HAP	24.0

Holmes County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Mastercraft Ind

Issue Date: 11/29/2010
Permit Number: P0106821
Permit Type: Initial Installation
Permit Description: 2 manual spray booths for the application of coatings to wood
Facility ID: 0238002003
Facility Location: Mastercraft Ind
6960 County Rd 672,
Berlin Twp., OH 44610
Facility Description: Urethane and Other Foam Product (except Polystyrene) Manufacturing, Nonupholstered Wood Household Furniture Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Zorica Dejanovic at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 43087 or (330)425-9171. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio | Environmental Protection Agency

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Mastercraft Ind

Facility ID:	0238002003
Permit Number:	P0106821
Permit Type:	Initial Installation
Issued:	11/29/2010
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Mastercraft Ind

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Authorization

Facility ID: 0238002003
Application Number(s): A0040213
Permit Number: P0106821
Permit Description: 2 manual spray booths for the application of coatings to wood
Permit Type: Initial Installation
Permit Fee: $400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 11/29/2010
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Mastercraft Ind
6960 County Rd 672
Berlin Twp., OH 44610

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0106821
Permit Description: 2 manual spray booths for the application of coatings to wood

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

Emissions Unit ID:	**K001**
Company Equipment ID:	Spray Booth #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Spray Booth #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.
The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

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

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

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

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

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

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.
If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

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

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

7. What reports must I submit under this permit?

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

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

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).
The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

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

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

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

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.
If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.
You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated

[1] Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

while the emissions unit was in operation, for at least five years from the date the record was generated.
Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

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

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

C. Emissions Unit Terms and Conditions

1. K001, Spray Booth #1

Operations, Property and/or Equipment Description:

Binks Spray Booth with HVLP for manual application of stains & dyes to wood

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

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

a. b)(1)e, d)(10), d)(11), d)(12), d)(13) and e)(3)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 19.73 pounds/hour (lbs/hr).
b.	OAC rule 3745-31-05(D)	See b)(2)a.
c.	OAC rule 3745-21-07(G)(2)	For each day during which any photochemically reactive material is employed, organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See b)(2)b and b)(2)c.
d.	OAC rule 3745-17-11(C)	See b)(2)d.
e.	ORC 3704.03(F)(4)(c)	See d)(10), d)(11), d)(12), d)(13) and e)(3).

(2) Additional Terms and Conditions

a. The permittee proposed the following restrictions to avoid Title V requirements, as well as MACT requirements under 40 CFR Part 63, Subpart JJ, Standards for Hazardous Air Pollutant Emissions From Wood Furniture Manufacturing Operations:

i. VOC emissions from emissions units K001 and K002, combined, shall not exceed 24.0 tons per year (tpy), based upon a rolling, 12-month summation;

ii. facility-wide emissions of each individual hazardous air pollutant (HAP) shall not exceed 9.9 tpy, based upon a rolling, 12-month summation; and

iii. facility-wide emissions of total combined HAPs shall not exceed 24.0 tpy, based upon a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of:	
	VOCs / Total Combined HAPs (tons)	Individual HAP (tons)
1	2	0.88
1-2	4	1.70
1-3	6	2.52
1-4	8	3.34
1-5	10	4.16
1-6	12	4.98
1-7	14	5.80
1-8	16	6.62
1-9	18	7.44
1-10	20	8.26
1-11	22	9.08
1-12	24	9.9

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOCs/ HAPs shall be based upon a rolling, 12-month summation of the emissions.

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

c. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The

following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)c, b)(2)b, d)(4) and f)(1)d

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

c) Operational Restrictions

(1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for this emissions unit:

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

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

c. the VOC content of each coating and clean up material, in lbs/gallon;

d. the total VOC emissions from all the coatings and clean up materials, in lbs/day;

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

f. the hourly VOC emission rate for all the coatings and cleanup materials, i.e., (d)/(e), in lbs/hr.

(2) The permittee shall maintain monthly records of the following information:

a. the coating usage for each month; and

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

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

(3) The permittee shall collect and record the following information each month for all materials containing any HAP[1] that are applied in the emissions unit:

a. the name and identification number/code of each coating, clean up, and any other material containing any HAP;

b. the name/identification of each individual HAP contained in each material applied (and identified in (a) above) and the pound(s) of each HAP/gallon of each HAP-containing material applied;

c. the number of gallons of each coating, clean up, and any other HAP-containing material applied during the month;

d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of (b) times (c) for all the materials applied during the month, divided by 2,000 pounds/ton;

e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from (d) above;

f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in (d) above, for the present month plus the previous 11 months of operation, in ton(s); and

g. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in (e) above, for the present month plus the previous 11 months of operation, in ton(s).

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA Northeast District Office agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and clean up materials.

(4) The permittee shall collect and record the following information each day for each emissions unit during which any photochemically reactive material is employed:

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

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

c. the OC content of each coating and clean up material, in lbs OC/gallon;

d. the total OC emissions from all the coatings and clean up 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 the coatings and clean up materials, i.e., (d)/(e), in lbs/hr.

[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 d)(4) shall be voided entirely.]

(5) 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 Ohio EPA Northeast District Office upon request.

(6) 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.

(7) 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.

(8) 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 Ohio EPA Northeast District Office upon request.

(9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were 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.

(10) The FEPTIO application for this/these emissions unit(s), K001 and K002, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC

3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:

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

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

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

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

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

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

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

   Toxic Contaminant: Ethyl benzene
   TLV (mg/m3): 434.19
   Maximum Hourly Emission Rate (lbs/hr): 0.39
   Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 30.64
   MAGLC (ug/m3): 10337.91

Toxic Contaminant: Toluene
TLV (mg/m3): 75.36
Maximum Hourly Emission Rate (lbs/hr): 1.12
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 88
MAGLC (ug/m3): 1794.33

Toxic Contaminant: Xylene
TLV (mg/m3): 434.19
Maximum Hourly Emission Rate (lbs/hr): 1.64
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 128.84
MAGLC (ug/m3): 10337.91

Toxic Contaminant: Stoddard Solvent
TLV (mg/m3): 572.60
Maximum Hourly Emission Rate (lbs/hr): 4.53
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 356
MAGLC (ug/m3): 13633.27

The permittee, has demonstrated that emissions of ethyl benzene, toluene, xylene, and stoddard solvent from emissions unit(s) K001 and K002 are calculated to be less than 80% of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

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

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

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

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

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the

emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

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

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

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

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

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

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

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month VOC emission limitation;

ii. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the coatings and cleanup materials employed; and

iii. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all the coatings and cleanup materials employed; and

iv. for the first 12 calendar months of operation, or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;

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

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

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

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

(3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

(4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. <u>Emission Limitation</u>:

VOC emissions shall not exceed 19.73 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping and reporting requirements specified in d)(1) and e)(4).

b. Emission Limitation:

VOC emissions from emissions units K001 and K002, combined, shall not exceed 24.0 tpy, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping and reporting requirements specified in d)(2) and e)(2).

c. Emission Limitation:

Facility-wide emissions of each individual HAP shall not exceed 9.9 tpy, based upon a rolling, 12-month summation.

Facility-wide emissions of total combined HAPs shall not exceed 24.0 tpy, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping and reporting requirements specified in d)(3) and e)(2).

d. Emission Limitation:

For each day during which any photochemically reactive material is employed, OC emissions shall not exceed 8 lbs/hr and 40 lbs/day.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping and reporting requirements specified in d)(4) and e)(4).

(2) If required, USEPA Method 24 or formulation data shall be used to determine the VOC/HAP content(s) of each coating and clean up material.

g) Miscellaneous Requirements

(1) None.

2. K002, Spray Booth #2

Operations, Property and/or Equipment Description:

GFS spray booth with an air-assisted airless spray gun for applying finish to wood

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

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

a. b)(1)e, d)(10), d)(11), d)(12), d)(13) and e)(3)

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 15.54 pounds/hour (lbs/hr).
b.	OAC rule 3745-31-05(D)	See b)(2)a.
c.	OAC rule 3745-21-07(G)(2)	For each day during which any photochemically reactive material is employed, organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day. See b)(2)b and b)(2)c.
d.	OAC rule 3745-17-11(C)	See b)(2)d.
e.	ORC 3704.03(F)(4)(c)	See d)(10), d)(11), d)(12), d)(13) and e)(3).

(2) Additional Terms and Conditions

a. The permittee proposed the following restrictions to avoid Title V requirements, as well as MACT requirements under 40 CFR Part 63, Subpart JJ, Standards for Hazardous Air Pollutant Emissions From Wood Furniture Manufacturing Operations:

i. VOC emissions from emissions units K001 and K002, combined, shall not exceed 24.0 tons per year (tpy), based upon a rolling, 12-month summation;

ii. facility-wide emissions of each individual hazardous air pollutant (HAP) shall not exceed 9.9 tpy, based upon a rolling, 12-month summation; and

iii. facility-wide emissions of total combined HAPs shall not exceed 24.0 tpy, based upon a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of:	
	VOCs / Total Combined HAPs (tons)	Individual HAP (tons)
1	2	0.88
1-2	4	1.70
1-3	6	2.52
1-4	8	3.34
1-5	10	4.16
1-6	12	4.98
1-7	14	5.80
1-8	16	6.62
1-9	18	7.44
1-10	20	8.26
1-11	22	9.08
1-12	24	9.9

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOCs/ HAPs shall be based upon a rolling, 12-month summation of the emissions.

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

c. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The

following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)c, b)(2)b, d)(4) and f)(1)d

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

c) Operational Restrictions

(1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each day for this emissions unit:

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

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

c. the VOC content of each coating and clean up material, in lbs/gallon;

d. the total VOC emissions from all the coatings and clean up materials, in lbs/day;

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

f. the hourly VOC emission rate for all the coatings and cleanup materials, i.e., (d)/(e), in lbs/hr.

(2) The permittee shall maintain monthly records of the following information:

a. the coating usage for each month; and

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

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

(3) The permittee shall collect and record the following information each month for all materials containing any HAP[1] that are applied in the emissions unit:

a. the name and identification number/code of each coating, clean up, and any other material containing any HAP;

b. the name/identification of each individual HAP contained in each material applied (and identified in (a) above) and the pound(s) of each HAP/gallon of each HAP-containing material applied;

c. the number of gallons of each coating, clean up, and any other HAP-containing material applied during the month;

d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of (b) times (c) for all the materials applied during the month, divided by 2,000 pounds/ton;

e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from (d) above;

f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in (d) above, for the present month plus the previous 11 months of operation, in ton(s); and

g. the total combined HAP emissions during the rolling, 12-month period, i.e., the summation of all HAP emissions, as recorded in (e) above, for the present month plus the previous 11 months of operation, in ton(s).

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA Northeast District Office agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and clean up materials.

(4) The permittee shall collect and record the following information each day for each emissions unit during which any photochemically reactive material is employed:

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

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

c. the OC content of each coating and clean up material, in lbs OC/gallon;

d. the total OC emissions from all the coatings and clean up 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 the coatings and clean up materials, i.e., (d)/(e), in lbs/hr.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photo-chemically 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 d)(4) shall be voided entirely.]

(5) 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 Ohio EPA Northeast District Office upon request.

(6) 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.

(7) 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.

(8) 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 Ohio EPA Northeast District Office upon request.

(9) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were 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.

(10) The FEPTIO application for this/these emissions unit(s), K001 and K002, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The Toxic Air Contaminant Statute, ORC

3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled Review of New Sources of Air Toxic Emissions, Option A, as follows:

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

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

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

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

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

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

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

   Toxic Contaminant: Ethyl benzene
   TLV (mg/m3): 434.19
   Maximum Hourly Emission Rate (lbs/hr): 0.39
   Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 30.64
   MAGLC (ug/m3): 10337.91

Toxic Contaminant: Toluene
TLV (mg/m3): 75.36
Maximum Hourly Emission Rate (lbs/hr): 1.12
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 88
MAGLC (ug/m3): 1794.33

Toxic Contaminant: Xylene
TLV (mg/m3): 434.19
Maximum Hourly Emission Rate (lbs/hr): 1.64
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 128.84
MAGLC (ug/m3): 10337.91

Toxic Contaminant: Stoddard Solvent
TLV (mg/m3): 572.60
Maximum Hourly Emission Rate (lbs/hr): 4.53
Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 356
MAGLC (ug/m3): 13633.27

The permittee, has demonstrated that emissions of ethyl benzene, toluene, xylene, and stoddard solvent from emissions unit(s) K001 and K002 are calculated to be less than 80% of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the Toxic Air Contaminant Statute, ORC 3704.03(F).

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

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

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

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

If the permittee determines that the Toxic Air Contaminant Statute will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the

emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

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

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

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

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

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

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

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

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

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month VOC emission limitation;

ii. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the coatings and cleanup materials employed; and

iii. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all the coatings and cleanup materials employed; and

iv. for the first 12 calendar months of operation, or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;

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

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

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

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

(3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

(4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. <u>Emission Limitation</u>:

VOC emissions shall not exceed 15.54 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping and reporting requirements specified in d)(1) and e)(4).

b. Emission Limitation:

VOC emissions from emissions units K001 and K002, combined, shall not exceed 24.0 tpy, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping and reporting requirements specified in d)(2) and e)(2).

c. Emission Limitation:

Facility-wide emissions of each individual HAP shall not exceed 9.9 tpy, based upon a rolling, 12-month summation.

Facility-wide emissions of total combined HAPs shall not exceed 24.0 tpy, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping and reporting requirements specified in d)(3) and e)(2).

d. Emission Limitation:

For each day during which any photochemically reactive material is employed, OC emissions shall not exceed 8 lbs/hr and 40 lbs/day.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping and reporting requirements specified in d)(4) and e)(4).

(2) If required, USEPA Method 24 or formulation data shall be used to determine the VOC/HAP content(s) of each coating and clean up material.

g) Miscellaneous Requirements

(1) None.