



Environmental
Protection Agency

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

1/6/2011

Lamar Troyer
Mullet Cabinets Inc
7488 SR 241
Millersburg, OH 44654

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0238000104
Permit Number: P0105942
Permit Type: Renewal
County: Holmes

Certified Mail

Yes	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
Yes	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NEDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Mullet Cabinets Inc**

Facility ID: 0238000104
Permit Number: P0105942
Permit Type: Renewal
Issued: 1/6/2011
Effective: 1/6/2011
Expiration: 1/5/2015



Division of Air Pollution Control
Permit-to-Install and Operate
for
Mullet Cabinets Inc

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Authorization

Facility ID: 0238000104
Application Number(s): A0038960, A0040892
Permit Number: P0105942
Permit Description: Renewal permit-to-install and operate (PTIO) for emissions unit R006, a laminate spray area.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 1/6/2011
Effective Date: 1/6/2011
Expiration Date: 1/5/2015
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Mullet Cabinets Inc
7488 SR 241
Millersburg, OH 44654

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: P0105942
Permit Description: Renewal permit-to-install and operate (PTIO) for emissions unit R006, a laminate spray area.

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

Emissions Unit ID:	R006
Company Equipment ID:	R006
Superseded Permit Number:	02-22833
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 submitting¹ 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 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

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).

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. R006

Operations, Property and/or Equipment Description:

Spray booth #6 for the application of coatings to wood-based products.

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, b)(2)h, d)(5), d)(6), d)(7), d)(8), e)(1), and f)(1)g.

(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. b)(1)d, b)(2)g, d)(4), e)(2), f)(1)d, and f)(1)e.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-07 (G)(2)	Organic compound (OC) emissions from this emissions unit shall not exceed forty (40) pounds per day and eight (8) pounds per hour. See b)(2)a and b)(2)c.
b.	OAC rule 3745-21-07 (M)(2)	Exempt. See b)(2)b and b)(2)c.
c.	OAC rule 3745-31-05 (A)(3)	See b)(2)d, b)(2)e, and b)(2)f.
d.	OAC rule 3745-31-05 (D)(1)(b)	See b)(2)g.
e.	ORC 3704.03 (F)(4)	See b)(2)h, d)(5), d)(6), d)(7), d)(8), e)(1), and f)(1)g.

(2) Additional Terms and Conditions

a. This 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.

- b. In accordance with OAC rule 3745-21-07(M)(3)(a), OAC rule 3745-21-07(M)(2) is not applicable because the emissions unit is not equipped with OC emissions control devices.
- 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 following terms and conditions shall become void after U.S. EPA approves the rule revision:

b)(1)a, b)(2)a, d)(1), and f)(1)a

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision:

b)(1)b and b)(2)b

- d. Each day that photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), are not employed, the VOC emissions from this emissions unit shall not exceed 3.87 pounds per hour, as a daily average. This limit is based upon the maximum application rate of 1.0 gallon per hour.

[Note: After the revision to OAC rule 3745-21-07 (G) is approved into the Ohio SIP, there shall be no reference to photochemically reactive materials.]

- e. The VOC emissions from all VOC containing-materials shall not exceed 17.0 tons per year.
- f. The VOC content of each adhesive shall not exceed 3.87 pounds per gallon, as applied.
- g. The permittee proposed the following facility-wide restrictions to avoid Title V requirements, as well as MACT requirements under 40 Code of Federal Register Part 63, subpart JJ, Standards for Hazardous Air Pollutant Emissions From Wood Furniture Manufacturing Operations:
- i. Each single hazardous air pollutant (HAP) emission shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation; and
- ii. Combined total HAPs emissions shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation.
- h. In order to demonstrate compliance with the "Toxic Air Contaminant Statute", the Director has established, per ORC 3704.03(F)(4)(c), a limit for hexane, which

shall not exceed 26.33 pounds per day. This daily allowable emissions rate was calculated by multiplying the approved daily operating schedule submitted in the permit application, by the emission rate modeled (to determine the ground level concentration).

- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall collect and record the following information each day during which photochemically reactive materials are employed in this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not a photochemically reactive clean-up material is employed in this emissions unit;
 - c. the number of gallons of each coating and photochemically reactive clean-up material employed minus the number of gallons of each coating and photochemically reactive clean-up material recovered for disposal;
 - d. the OC content of each coating and photochemically reactive clean-up material, in pounds OC per gallon;
 - e. the total OC emissions from all coatings and photochemically reactive clean-up materials, i.e., the sum of "c" times "d", in pounds per day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly OC emission rate from all the coatings and photochemically reactive clean-up materials, i.e., "e" divided by "f", in pounds per hour.
 - (2) The permittee shall collect and record the following information each day during which no photochemically reactive 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 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 cleanup material, in pounds VOC per gallon;
 - d. the total VOC emissions from all coatings and cleanup materials, i.e., the sum of "b" times "c", in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and

- f. the average hourly VOC emission rate from all coatings when no photochemically reactive material is employed, i.e., “d” divided by “e”, in pounds per hour.

[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 on a daily basis with no reference to photochemically reactive.]

- (3) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name or identification number of each coating and cleanup material employed;
 - b. the volume, in gallons, of each coating and cleanup material employed;
 - c. each single HAP content for each coating and cleanup material employed, in pounds per gallon;
 - d. the total emissions of each single HAP from all coatings and cleanup materials employed, i.e., the summation of the products of “b” times “c”;
 - e. the combined total HAPs content for each coating and cleanup material employed, in pounds per gallon; and
 - f. the total emissions of combined total HAPs from all coatings and cleanup materials employed, i.e., the summation of the products of “b” times “e”..
- (4) The permittee shall keep the following facility-wide information each month:
 - a. the monthly each single HAP emissions, in tons per month;
 - b. the rolling, 12-month summation of each single HAP emissions, in tons;
 - c. the monthly combined total HAPs emissions, in tons per month; and
 - d. the rolling, 12-month summation of combined total HAPs emissions, in tons.
- (5) The FEPTIO application for this emissions unit, R006, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute”, ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(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 workweek, for each toxic compound

emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

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

- 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: Hexane

TLV (mg/m³): 176.2

Maximum Hourly Emission Rate (lbs/hr): 1.199

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 4,144

MAGLC (ug/m³): 4,145

The permittee, having demonstrated that emissions of hexane, from emissions unit R006, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (6) Prior to making any physical changes to or changes in the method of operation of the emissions unit, 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 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 "Toxic Air Contaminant Statute", ORC 3704.03(F), 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.

- (7) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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

e) Reporting Requirements

- (1) The permittee shall include in the annual Permit Evaluation Report (PER) any exceedance of the daily limitation on toxic air emissions or any deviation from a restriction on the process or hours of operation, as established by the Director, in order to maintain any toxic air contaminant below its MAGLC. The permittee shall also include in the PER any changes made, during the calendar year, to a parameter or value entered into the dispersion model that was used to maintain compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions, emissions unit, or the exhaust stack have been made, then the report shall include a statement to this effect.
- (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. Facility-wide emissions of each single hazardous air pollutant (HAP) shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation of each single HAP emissions; and
 - ii. Facility-wide emissions of combined total HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation of combined total HAPs.
 - 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 Director (the Ohio EPA Northeast District Office).

- (3) The permittee shall also submit annual reports that specify the total facility VOC emissions, for the previous calendar year. The reports shall be submitted by April 15 of

each year. This reporting requirement may be satisfied by including and identifying the specific emission data for each emissions unit in the annual Fee Emission Report.

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

f) **Testing Requirements**

- (1) Compliance with the allowable emission limitations in b)(1) and b)(2) above shall be determined in accordance with the following methods:

a. Emission Limitations:

8 pounds per hour and 40 pounds per day of OC emissions for each day during which photochemically reactive materials are employed in each emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(1) above.

b. Emission Limitations:

Each day that photochemically reactive materials, as defined in OAC rule 3745-21-01 (C)(5), are not employed, the VOC emissions from this emissions unit shall not exceed 3.87 pounds per hour, as a daily average.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2)f above.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, there shall be no reference to photochemically reactive materials.]

c. Emission Limitation:

The VOC emissions from all VOC containing-materials shall not exceed 17.0 tons per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(2)d, and shall be the sum for the calendar year.

d. Emission Limitation:

Facility-wide emissions of each single HAP shall not exceed 9.90 tons per year, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(4)b.

e. Emission Limitation:

Facility-wide emissions of combined total HAPs shall not exceed 24.90 tons per year, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(4)d.

f. Emission Limitation:

The VOC content of each adhesive shall not exceed 3.87 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d)(1)d or d)(2)c.

g. Emission Limitation:

Hexane emissions from this emissions unit shall not exceed 26.33 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the following:

$$E_{\text{Hexane}} = (CT)(M)(AT)$$

Where,

E_{Hexane} = daily hexane emissions, in pounds per day;

CT = the gallons of coating applied per day (maximum 24 gallons per day);

M = the coating density, in pounds per gallon (6.65 pounds per gallon is the current adhesive density); and

AT = the percent, by weight, of hexane in the coating (16.5% of hexane in current adhesive).



- (2) USEPA Method 24 or formulation data shall be used to determine the OC content of each coating and cleanup material.
 - (3) Formulation data shall be used to determine the contents of each single HAP and combined total HAPs.
- g) Miscellaneous Requirements
- (1) None.