



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

2/23/2011

Mr. Harvey Zook  
Valley Flooring, LLC  
6078 Kerr Road  
Gambier, OH 43022

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

Facility ID: 0142000409  
Permit Number: P0106960  
Permit Type: Initial Installation  
County: Knox

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)

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](http://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 Josh Mandel," 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, Central District Office at (614)728-3778 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](http://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-CDO





## Response to Comments

Response to comments for: Permit-To-Install and Operate

Facility ID:	0142000409
Facility Name:	Valley Flooring, LLC
Facility Description:	wood flooring manufacture
Facility Address:	6078 Kerr Road Gambier, OH 43022 Knox County
Permit #:	P0106960, Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Mt. Vernon News on 01/21/2011. The comment period ended on 02/20/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **None**
  - a. Comment: **None**
  - b. Response: **None**





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Valley Flooring, LLC**

Facility ID:	0142000409
Permit Number:	P0106960
Permit Type:	Initial Installation
Issued:	2/23/2011
Effective:	2/23/2011
Expiration:	2/23/2016





Division of Air Pollution Control
Permit-to-Install and Operate
for
Valley Flooring, LLC

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## Authorization

Facility ID: 0142000409  
Application Number(s): A0039565, A0040397  
Permit Number: P0106960  
Permit Description: Initial Installation of wood flooring manufacturing facility, including generators, wood processing and coating operations.  
Permit Type: Initial Installation  
Permit Fee: \$2,200.00  
Issue Date: 2/23/2011  
Effective Date: 2/23/2011  
Expiration Date: 2/23/2016  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Valley Flooring, LLC  
6078 Kerr Road  
Gambier, OH 43022

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

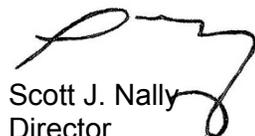
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

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

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0106960  
Permit Description: Initial Installation of wood flooring manufacturing facility, including generators, wood processing and coating operations.

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

**Emissions Unit ID: B001**  
Company Equipment ID: B001  
Superseded Permit Number:  
General Permit Category and Type: Not Applicable

**Emissions Unit ID: P001**  
Company Equipment ID: P001  
Superseded Permit Number:  
General Permit Category and Type: Not Applicable

**Group Name: Coating Booths**

<b>Emissions Unit ID:</b>	<b>R001</b>
Company Equipment ID:	R001
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R002</b>
Company Equipment ID:	R002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R003</b>
Company Equipment ID:	Spray Booth #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R004</b>
Company Equipment ID:	Spray Booth #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R005</b>
Company Equipment ID:	Spray Booth #5
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, Central 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<sup>1</sup> 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.

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<sup>1</sup> 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).

**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**

**Final Permit-to-Install and Operate**

Valley Flooring, LLC

**Permit Number:** P0106960

**Facility ID:** 0142000409

**Effective Date:** 2/23/2011

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) The emissions of a single Hazardous Air Pollutant (HAP) from emissions units R001, R002, R003, R004 and R005 shall not exceed 9.9 tons per year, based upon a rolling, 12-month summation of the emissions.
    - (2) The emissions of total HAPs from emissions units R001, R002, R003, R004 and R005 shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation of the emissions.
    - (3) The emissions of total Volatile Organic Compounds (VOC) from emissions units R001, R002, R003, R004 and R005 shall not exceed 50 tons per year, based upon a rolling, 12-month summation of the emissions.
    - (4) Permittee proposed a voluntary restriction for emissions units R001, R002, R003, R004 and R005 of a maximum 112.50 operating hours per week per emissions unit in order to meet the requirements of the Control of Toxic Emissions under Ohio Revised Code (ORC) 3704.03 (F)(4)(d).

## **C. Emissions Unit Terms and Conditions**

**1. B001, Diesel Engine #1**

**Operations, Property and/or Equipment Description:**

215 HP Stationary Diesel Engine

- 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. None.
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. None.
- 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.	40 CFR Part 60, Subpart IIII 40 CFR 60.4204(a) Table 1 to Subpart IIII ORC 3704.03(T) (BAT)	0.54 gram PM/kW-hr 9.2 grams NOx/kW-hr 1.3 grams HC/kW-hr 11.4 grams CO/kW-hr See terms b)(2)(a through d)
b.	40 CFR 60.4207(a) 40 CFR 80.510(a) ORC 3704.03(T) (BAT)	The sulfur content of the diesel fuel burned in this emissions unit shall not exceed 500 ppm per-gallon of oil or 0.05% sulfur by weight. See term b)(2)c.
c.	40 CFR 60.4207(b) 40 CFR 80.510(b) ORC 3704.03(T) (BAT)	Beginning 10/01/10 the sulfur content of the diesel fuel burned in this emissions unit shall not exceed 15 ppm per-gallon of oil or 0.0015% sulfur by weight. See term b)(2)c.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed twenty (20) percent opacity, as a six-minute average, except as specified by rule.
e.	OAC rule 3745-17-11(B)(5)	The emission limitation specified by this

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule is less stringent than the emission limitation established for PE pursuant to 40 CFR Part 60, Subpart IIII.
f.	40 CFR 63 Subpart ZZZZ 40 CFR 63.6590(c)	A new area source operating in compliance with Part 60 Subpart IIII is the demonstration of compliance for 40 CFR 63 Subpart ZZZZ.

(2) Additional Terms and Conditions

- a. This stationary compression ignition (CI), internal combustion engine (ICE) is subject to and shall be operated in compliance with the requirements of 40 CFR Part 60, Subpart IIII, the standards of performance for stationary CI, ICE.

[40 CFR 60.4200(a)]

- b. The pre-2007 stationary CI, ICE shall either be purchased certified by the manufacturer to emission standards as stringent as those identified in 40 CFR 60.4204(a) and found in Table 1 to Subpart IIII (equivalent to the Tier 1 emission standards in Table 1 of 40 CFR Part 89), based on the maximum rated engine power; or if the pre-2007 model year engine is not certified by the manufacturer methods specified in paragraphs (b)(2) through (5) of 40 CFR 60.4211, as detailed below (term b)(2)d.).

[40 CFR 60.4204(a)] and [40 CFR 60.4211(b)]

- c. The quality of the diesel fuel burned in this emissions unit shall meet the following specifications on an “as received” basis:

- i. prior to October 1, 2010, a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.05 pound sulfur dioxide/MMBtu actual heat input; and 500 ppm sulfur per-gallon of oil or 0.05% sulfur by weight;
- ii. beginning on and after October 1, 2010, a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.0015 pound sulfur dioxide/MMBtu actual heat input; and 15 ppm sulfur per-gallon of oil or 0.0015% sulfur by weight;
- iii. a cetane index of 40 or an aromatic content of 35 volume percent; and
- iv. greater than 135,000 Btu/gallon of oil.

Compliance with the above-mentioned specifications shall be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil.

[40 CFR 60.4207] and [40 CFR 80.510(a) and (b)]

- d. As required by 40 CFR 60.4211(b), the permittee shall demonstrate compliance with the emission standards specified in Subpart IIII, for the pre-2007 model year ICE, through one of the following methods:
  - i. purchase the engine certified according to 40 CFR Part 89, as applicable for the same model year and maximum engine power, and assure it is installed and configured according the manufacturer's specifications;
  - ii. maintain records of performance test results for each pollutant, obtained through the performance test methods required in 40 CFR 60.4212 or 40 CFR 60.4213 and conducted on a similar engine;
  - iii. maintain records of the engine manufacturer's test data showing compliance with the standards; or
  - iv. maintain records of control device vendor data demonstrating compliance with the standards, for the emissions unit using the same control equipment.

[40 CFR 60.4211(b)]

c) Operational Restrictions

- (1) This stationary CI, ICE shall be installed, operated, and maintained according to the manufacturer's specifications, written instructions, and procedures, and/or according to procedures developed by the permittee that have been approved by the engine manufacturer in writing, over the entire life of the engine. The permittee shall operate and maintain the stationary CI ICE to achieve the Tier 1 emission standards from Table 1 of NSPS Subpart IIII, as required per 40 CFR 60.4204(a).

[40 CFR 60.4206] and [40 CFR 60.4211(a)]

- (2) Diesel fuel burned in the CI, ICE shall not exceed the tiered limits for sulfur as specified by 40 CFR 80.510:
  - a. prior to October 1, 2010, the sulfur content of the diesel fuel shall not exceed 500 ppm per-gallon of oil or 0.05% sulfur by weight; and
  - b. beginning on and after October 1, 2010 the maximum sulfur content of diesel fuel shall not exceed 15 ppm per-gallon of oil or 0.0015% sulfur by weight.

The permittee of the pre-2011 model year stationary CI ICE may petition the Director for approval to use remaining non-compliant fuel that does not meet the sulfur content requirements after 10/01/10, for the purpose of using up existing inventories.

[40 CFR 60.4207] and [40 CFR 80.510(a) and (b)]

- (3) If the stationary CI internal combustion engine is equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the diesel particulate filter

- (4) must be installed with a backpressure monitor that notifies the permittee when the high backpressure limit of the engine is approached.

[40 CFR 60.4209(b)]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of the diesel oil received and the oil supplier's (or permittee's) analyses for sulfur content, in parts per million per-gallon (40 CFR 80.510) or percent by weight. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR 80.580, using the appropriate ASTM methods. These records shall be retained for a minimum of three years and shall be available for inspection by the Director or his/her representative.

[40 CFR 60.4207(a) and (b)]

- (2) The permittee shall maintain the manufacturer's certification or performance test data for this ICE or for a similar ICE, that adequately demonstrates compliance with the applicable emission standards in Table 1 to Subpart IIII, on site or at a central location for all facility CI ICE and it shall be made available for review upon request. If the manufacturer's certification or the compliance test data is not kept on site, the permittee shall maintain a log for the location of each ICE and it shall identify the agency-assigned emissions unit number, the manufacturer's identification number, and the specific test data used to demonstrate compliance or the certificate identification number. If test data from a similar engine is used to demonstrate compliance, the test results shall identify the model year, the cylinder displacement and rated power of the tested ICE, the test methods and procedures followed, and the percent(s) of maximum torque/power and speed(s) (rpm) maintained or attained during the emissions test. The manufacturer's operations manual and any written instructions or procedures developed by the permittee and approved by the manufacturer shall be maintained at the same location as the ICE.

[40 CFR 60.4211(b)]

- (3) If the stationary CI internal combustion engine is equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the permittee shall keep records of the date, time, and any corrective action(s) taken in response to the notification from the backpressure monitor, that the high backpressure limit of the engine has been approached or exceeded.

[40 CFR 60.4214(c)]

e) Reporting Requirements

- (1) 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.

[OAC 3745-15-03(B)(2) and (D)]

- (2) The permittee shall identify in the annual permit evaluation report any period of time (date and number of hours) that the quality of oil burned in this emissions unit did not meet the requirements established in 40 CFR 80.510, based upon the required fuel records; and the amount of non-compliant fuel burned on each such occasion.[40 CFR 60.4207] and [40 CFR 80.510(a) and (b)]
- (3) If the stationary CI internal combustion engine is equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the permittee shall include in the PER any records of the date, time, and any corrective action(s) taken in response to the notification from the monitor that the backpressure has been approached or exceeded.

[40 CFR 60.4214(c)]

f) Testing Requirements

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

a. Opacity Limitation:

Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed twenty (20) percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A.

[OAC rule 3745-17-07(A)(1)]

b. Emission Limitations:

0.54 gram PM/kW-hr

Applicable Compliance Method:

Compliance with the emission limitations may be based on the manufacturer's certification of the engine (if certified) or the PE emissions testing data submitted for this engine or a similar engine, and by maintaining the ICE according to the manufacturer's specifications. The g/kW-hr limit is the emission limitation from Table 1 from 40 CFR Part 60, Subpart IIII, the exhaust emission standards for pre-2007 model year diesel engines greater than or equal to 175 horsepower (130 kW).

If required, the permittee shall demonstrate compliance with the emission limitations through exhaust emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

[OAC rule 3745-17-11(B)(5)(a)]

c. Emission Limitations:

9.2 grams NO<sub>x</sub>/kW-hr

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the manufacturer's certification of the engine (if certified) or the NO<sub>x</sub> emissions testing data submitted for this engine or a similar engine, and by maintaining the engine according to the manufacturer's specifications. The g/kW-hr limit is the emission limitation from Table 1 from 40 CFR Part 60, Subpart IIII, the exhaust emission standards for pre-2007 model year diesel engines between 50 and less than 175 horsepower (37 to <130 kW).

If required, the permittee shall demonstrate compliance with the emission limitations through performance tests conducted in accordance with the provisions in term f)(1)e below.

[40 CFR 60.4204(a)] and [40 CFR 60.4212(a) and (d)]

d. Emission Limitations:

11.4 grams CO/kW-hr

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the manufacturer's certification of the engine (if certified) or the CO emissions testing data submitted for this engine or a similar engine, and by maintaining it according to the manufacturer's specifications. The g/kW-hr limit is the emission limitation from Table 1 from 40 CFR Part 60, Subpart IIII, the exhaust emission standards for pre-2007 model year diesel engines greater than or equal to 175 horsepower (130 kW).

If required, the permittee shall demonstrate compliance with the emission limitations through performance tests conducted in accordance with the provisions in term f)(1)h below.

[40 CFR 60.4204(a)], [40 CFR 60.4212(a) and (d)], and [OAC rule 3745-31-05(D)]

e. Emission Limitations:

1.3 gram HC/kW-hr

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the manufacturer's certification of the engine (if certified) or the VOC emissions testing data submitted for this engine or a similar engine, and by maintaining the ICE according to the manufacturer's specifications. The g/kW-hr limit is the emission limitation from Table 1 from 40 CFR Part 60, Subpart IIII, the exhaust emission standards for pre-2007 model year diesel engines greater than or equal to 175 horsepower (130 kW).

If required, the permittee shall demonstrate compliance with the emission limitations through performance tests conducted in accordance with the provisions in term f)(1)h below.

[40 CFR 60.4204(a)], [40 CFR 60.4212(a) and (d)], and [OAC rule 3745-31-05(D)]

f. Sulfur Content Limitations for Diesel Fuel:

Sulfur content 500 ppm per-gallon or  $\leq 0.05\%$  by weight sulfur in diesel fuel; and

Sulfur content 15 ppm per-gallon or  $\leq 0.0015\%$  by weight sulfur beginning 10/01/10

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements for the sulfur content of each shipment of diesel oil received. If meeting the standards in 40 CFR 80.510, this calculates to approximately 0.051 lb/MMBtu prior to 10/01/10 and 0.0015 lb/MMBtu on and after 10/01/10.

[40 CFR 60.4207] and [40 CFR 80.510(a) and (b)]

g. Where compliance for NOx is demonstrated through performance testing, it shall be conducted using one of the following test methods or procedures:

i. in accordance with 40 CFR 60.4212, conduct exhaust emissions testing using the in-use testing procedures found in 40 CFR Part 1039, Subpart F, measuring the emissions of the regulated pollutants as specified in 40 CFR 1065; or

ii. in accordance with 40 CFR 60.4213, conduct exhaust emissions testing using the test methods identified in Table 7 to Subpart IIII of Part 60.

If demonstrating compliance through the in-use testing procedures in 40 CFR part 1039, subpart F, exhaust emissions from the pre-2007 model year stationary CI ICE shall not exceed the "not to exceed" (NTE) numerical requirements, rounded to the same number of decimal places as the applicable standard in Table 1 to Subpart IIII, determined from the following equation:

$$\text{NTE requirement for each pollutant} = 1.25 \times \text{STD}$$

Where:

STD = The standard specified for the pollutant in Table 1 to Subpart IIII.

[40 CFR 60.4212(a) and (d)]

g) Miscellaneous Requirements

(1) None.

**2. P001, Wood Working Operations**

**Operations, Property and/or Equipment Description:**

Woodworking equipment and associated ductwork, fan, and product collection cyclone with load-out.

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. None.

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

a. None.

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 3745-17-07 (A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-07 (B)	Exempt. See b)(2)a.
c.	OAC rule 3745-17-08 (B)	Exempt. See b)(2)b.
d.	OAC rule 3745-17-11	See b)(2)c and b)(2)d.
e.	OAC rule 3745-31-05(A)(3), as effective 11/30/01.	Particulate emissions from this emissions unit shall not exceed 0.53 pound per hour and 2.30 tons per year.
f.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06.	See b)(2)e.

(2) Additional Terms and Conditions

- a. In accordance with OAC rule 3745-17-07 (B)(11)(d), OAC rule 3745-17-07 (B)(1) shall not apply to any fugitive emissions units which are exempted from the requirements of OAC rule 3745-17-07 (B).
- b. The facility is not located at an Appendix A area of OAC rule 3745-17-08. In accordance with OAC rule 3745-17-08 (A)(1), this emissions unit is exempt from the requirements of OAC rule 3745-17-08 (B).
- c. The uncontrolled emission rate for this emissions unit is not ascertained, and therefore, in accordance with OAC rule 3745-17-11 (A)(2)(a), Figure II of OAC rule 3745-17-11 is not applicable to this emissions unit.
- d. The facility is located in Knox County. It is exempt from Table I requirements, per OAC rule 3745-17-11 (A)(2)(b).
- e. The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the calculated annual emission rate for particulate emissions is less than 10 tons/yr.
- f. The emissions from this emissions unit shall be vented to the cyclone and baghouse at all times the emissions unit is in operation.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The acceptable range for the pressure drop across the baghouse shall be based upon the manufacturer's specifications of 0.125 to 8 inches of water, until such time as any required performance testing is conducted and an alternative pressure drop range and/or limit is established.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit is in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

- (3) This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.
- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;

- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.
- (5) If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.
- e) Reporting Requirements
- (1) 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.
  - (2) The permittee shall identify in the Annual Permit Evaluation Report (PER) the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
    - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
    - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
    - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
    - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken;
    - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit;
    - f. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

- g. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) Testing Requirements

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

- a. Emissions Limitations:

Particulate emissions from this emissions unit shall not exceed 0.53 pound per hour and 2.30 tons per year.

Applicable Compliance Methods:

Compliance shall be determined based upon the following equations:

$$E_H = (EF)(FR)(60 \text{ min/hr})/(7,000 \text{ grain/lb})$$

$$E_P = (EF)(FR)(60 \text{ min/hr})(8,760 \text{ hr/yr})/(7,000 \text{ grain/lb})(2,000 \text{ lbs/ton})$$

Where,

$E_H$  = Hourly particulate emission rate, in pound per hour;

$E_P$  = Annual particulate emission rate, in tons per year;

EF = Emission factor, 0.01 grain/dcfm, AP-42, table 10.4-1, 4/78; and

FR = Gas flow rate for baghouse outlet = 6130 acfm.

- b. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

- (1) None.

**3. Emissions Unit Group - Coating Booths: R001, R002, R003, R004, R005,**

EU ID	Operations, Property and/or Equipment Description
R001	Spray Booth #1 - 4,241 cfm, crossdraft spray booth (stains, sealer, and topcoat application).
R002	Spray Booth #2 - 4,241 cfm, crossdraft spray booth (sealer and topcoat application)
R003	Spray Booth #3 with dry filtration (stain application)
R004	Spray Booth #4 with dry filtration (sealer application)
R005	Spray Booth #5 with dry filtration (topcoat application)

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)g, d)(6), d)(7), d)(8), and d)(9).

(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)e, b)(2)b, b)(2)e, c)(2), d)(4), d)(5), e)(2), and f)(1)e.

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 3745-17-11(C)	See c)(1), d)(10), d)(11), d)(12), d)(13) and d)(14).
b.	OAC rule 3745-21-07(G)(2)	Forty (40) pounds per day and eight (8) pounds per hour of organic compound (OC) emissions from each emissions unit for each day during which any photochemically reactive material is employed.  See b)(2)a.
c.	ORC 3704.03(T) Best Available Technology (BAT) Determinations for NAAQS Pollutants > 10 TPY	Volatile organic compound (VOC) emissions, from emissions units R001, R002 and R003, shall not exceed 48.7 tons as a rolling, 12-month summation.  VOC emissions, from emissions units

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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		R004 and R005, shall not exceed 43.8 tons as a rolling, 12-month summation.
d.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Particulate Emissions (PE) from emissions units R001, R002, R003, R004 and R005, individually, shall not exceed 0.551 lb/hr and 2.41 TPY.  The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-17-11 (C) and OAC rule 3745-31-05 (D)(1)(b).  See b)(2)c.
e.	OAC rule 3745-31-05(D) (Synthetic Minor to avoid Title V)	See b)(2)b, b)(2)e, and c)(2).
f.	OAC rule 3745-31-05(E)	See c)(3).
g.	ORC 3704.03(F)(4)(c) (Toxic Air Contaminants)	See d)(6), d)(7), d)(8), and d)(9).
h.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)d.

(2) Additional Terms and Conditions

- a. 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.

The OC emission limitations of eight (8) pounds per hour and forty (40) pounds per day when photochemically reactive materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC 3745-21-07 (G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting, and testing requirements related to these hourly and daily limitations shall be void.

- b. Emissions from all coatings and cleanup materials from emissions units R001, R002, R003, R004 and R005, combined, not to exceed 50.0 tons of OC per year, as a rolling, 12-month summation, 9.9 tons of a single hazardous air pollutant (HAP) per year, and 24.9 tons total HAP per year to avoid being subject to the requirements of Title V.
- c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006, (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality

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Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05, these emission limitations/control measures no longer apply.

- d. The following terms and conditions apply once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan:
  - i. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM emissions from this air contaminant source since the calculated annual emission rate for PM is less than 10 tons/year, taking into account the federally enforceable rule limit of 0.551 pound per hour under OAC rule 3745-17-11(B).
  - ii. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the calculated annual emission rate for VOC is less than 10 tons/year, taking into account the federally enforceable rule limit established under OAC rule 3745-31-05(D).
- e. The maximum annual coating usage for emissions units R001, R002, R003, R004 and R005, combined, shall not exceed 15730.7 gallons, based upon a rolling, 12-month summation of the coating usage figures. 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 coating usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage</u>
1	1350
1-2	2700
1-3	4050
1-4	5400
1-5	6750
1-6	8100
1-7	9450
1-8	10800
1-9	12150
1-10	13500
1-11	14850
1-12	15730.7

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

c) Operational Restrictions

- (1) All exhaust from each emissions unit shall pass through the dry filters whenever the emissions unit is in operation.
- (2) The weight of organic material in solvent evaporated (solvent usage, minus the number of gallons recovered for disposal), which is equivalent to VOC emissions, shall be less than 50 tons during any rolling, 12-month summation from emissions units R001, R002, R003, R004 and R005 combined.
- (3) Permittee proposed a voluntary restriction of a maximum 112.50 operating hours per week per emissions unit, R001, R002, R003, R004 and R005, in order to meet the requirements of the Control of Toxic Emissions under Ohio Revised Code (ORC) 3704.03 (F)(4)(d).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records for each emissions unit that document all time periods during which any dry filters were not in service when the emissions unit was in operation.
- (2) 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 cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;
  - c. the OC content of each coating and cleanup material, in pounds OC per gallon;
  - d. the total OC emissions from all the coatings and cleanup materials, in pounds per day;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly OC emission rate from all the coatings and cleanup materials, i.e., (d)/(e), in pounds per hour.

[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)(2) shall be voided entirely.]

- (3) The permittee shall collect and record the total number of hours the emissions unit was in operation each week for each emissions unit.

- (4) The permittee shall collect and record the following information each month for each emissions unit:
- a. the company identification for each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;
  - c. the single HAP contents of each coating and cleanup material, in pounds per gallon, as applied;
  - d. the total HAP content of each coating and cleanup material, in pounds per gallon, as applied;
  - e. the number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;
  - f. the total VOC emissions from all coatings and cleanup materials employed, in pounds per month, i.e., sum of (b) times (e);
  - g. the total single HAP emissions from all coatings and cleanup materials employed, in pounds per month, i.e., sum of (c) times (e); and
  - h. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds per month, i.e., sum of (d) times (e).
- (5) The permittee shall calculate and record the following information each month for emissions units R001, R002, R003, R004 and R005, combined:
- a. the total monthly VOC emissions from all coatings and cleanup materials employed, in tons (calculated by summing the monthly VOC emissions for R001, R002, R003, R004 and R005);
  - b. the rolling, 12-month VOC emissions from all coatings and cleanup materials employed, from emissions units R001, R002, R003, R004 and R005, combined, in tons.
  - c. the total monthly single HAP emissions from all coatings and cleanup materials employed, in tons (calculated by summing the monthly VOC emissions for R001, R002, R003, R004 and R005);
  - d. the rolling, 12-month single HAP emissions from all coatings and cleanup materials employed, from emissions units R001, R002, R003, R004 and R005, combined, in tons.
  - e. the total monthly combined HAP emissions from all coatings and cleanup materials employed, in tons (calculated by summing the monthly VOC emissions for R001, R002, R003, R004 and R005); and
  - f. the rolling, 12-month combined HAP emissions from all coatings and cleanup materials employed, from emissions units R001, R002, R003, R004 and R005, combined, in tons.

(6) This FEPTIO application for emissions units R001, R002, R003, R004 and R005 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 these emissions units 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 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(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 12 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 or "worst case" toxic contaminant(s):

i. Compound: Toluene

TLV (mg/m<sup>3</sup>): 75.36196

Maximum Hourly Emission Rate (lbs/hr): 3.70

Predicted 1-Hour Maximum Ground Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 6410  
@21m, fence line (80.77m) is 2073

Adjusted MAGLC ( $\mu\text{g}/\text{m}^3$ ): 5,024.13

ii. Compound: Xylene

TLV ( $\text{mg}/\text{m}^3$ ): 434.19223

Maximum Hourly Emission Rate ( $\text{lbs}/\text{hr}$ ): 4.01

Predicted 1-Hour Maximum Ground Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 6947.52

Adjusted MAGLC ( $\mu\text{g}/\text{m}^3$ ): 28,946.15

iii. Compound: Stoddard Solvent

TLV ( $\text{mg}/\text{m}^3$ ): 572.59714

Maximum Hourly Emission Rate ( $\text{lbs}/\text{hr}$ ): 7.215

Predicted 1-Hour Maximum Ground Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 12,500

Adjusted MAGLC ( $\mu\text{g}/\text{m}^3$ ): 38,173.14

iv. Compound: ethyl benzene

TLV ( $\text{mg}/\text{m}^3$ ): 434.19223

Maximum Hourly Emission Rate ( $\text{lbs}/\text{hr}$ ): 0.87

Predicted 1-Hour Maximum Ground Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 1507

Adjusted MAGLC ( $\mu\text{g}/\text{m}^3$ ): 28,946.15

The permittee, has demonstrated that emissions of toluene, xylene, Stoddard solvent and ethyl benzene from emissions units R001, R002, R003, R004 and R005, combined, are calculated to be less than eighty percent 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).

- (7) Prior to making any physical changes to or changes in the method of operation of the emissions units, 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", 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.

- (8) 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.
- (9) 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

- (10) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.
- (11) The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
- (12) The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
- (13) The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
- (14) In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

e) Reporting Requirements

- (1) The permittee shall notify the Director in writing of any daily record for each emissions unit that showing the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Central District Office) within 30 days after the event occurs.
- (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 photochemically reactive material emission limitations of 40 pounds per day and 8 pounds per hour from emissions units R001, R002, R003, R004 and R005, combined, and the actual

photochemically reactive material emissions from emissions units R001, R002, R003, R004 and R005, combined, during each such period;

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

- ii. all exceedances of the rolling, 12-month limitation on coating usage; and 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 coating usage levels;
  - iii. all exceedances of the rolling, 12-month VOC emission limitation of 50 tons from emissions units R001, R002, R003, R004 and R005, combined, and the actual VOC emissions from emissions units R001, R002, R003, R004 and R005, combined, during each such period;
  - iv. all exceedances of the rolling, 12-month single HAP emission limitation of 9.9 tons from emissions units R001, R002, R003, R004 and R005, combined, and the actual single HAP emissions from emissions units R001, R002, R003, R004 and R005, combined, during each such period;
  - v. all exceedances of the rolling, 12-month combined HAP emission limitation of 24.9 tons from emissions units R001, R002, R003, R004 and R005, combined, and the actual VOC emissions from emissions units R001, R002, R003, R004 and R005, combined, during each such period;
- 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 Central District Office).

- (3) 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 twelve-months for each air contaminant source identified in this permit.

- (4) The permittee shall also submit annual reports that specify the total VOC emissions from emissions units R001, R002, R003, R004 and R005, combined, 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 the emissions units in the annual Fee Emission Report.

f) Testing Requirements

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

a. Emission Limitations:

Forty (40) pounds per day and eight (8) pounds per hour of OC emissions from each emissions unit for each day during which any photochemically reactive material is employed

Applicable Compliance Method:

Compliance with the daily and hourly allowable OC emission limitations shall be determined based upon the record keeping requirements specified in d)(2).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, section f)(1)a shall be voided.]

b. Emission Limitations:

VOC emissions, from emissions units R001, R002 and R003, shall not exceed 48.7 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with shall be determined based upon the record keeping requirements specified in d)(5).

c. Emission Limitations:

VOC emissions, from emissions units R004 and R005, shall not exceed 43.8 tons as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with shall be determined based upon the record keeping requirements specified in d)(5).

d. Emission Limitations:

PE from emissions units R001, R002, R003, R004 and R005, individually, shall not exceed 0.551 lb/hr and 2.41 TPY.

Applicable Compliance Method:

Compliance with the hourly allowable PE emission limitation shall be demonstrated in accordance with Method 5 of 40 CFR Part 60, Appendix A.

e. Emission Limitation:

9.9 tons of a single HAP, 24.9 tons total HAP, and 50 tons of VOC emissions per rolling, 12-month period from all the coatings and cleanup materials for emissions units R001 R002, R003, R004 and R005, combined.

Applicable Compliance Method:

Compliance with shall be determined based upon the record keeping requirements specified in d)(5).

f. Emission Limitations:

112.50 operating hours per week per emissions unit, R001 R002, R003, R004 and R005

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements established in d)(3).

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

g) Miscellaneous Requirements

- (1) None.