



Environmental Protection Agency

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

3/25/2011

Jim Frazzini  
TODCO Div. Overhead Door Corp.  
1332 Fairground Road East  
Marion, OH 43302

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0351010147  
Permit Number: P0107615  
Permit Type: Renewal  
County: Marion

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, Northwest District Office at (419)352-8461 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-NWDO





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
TODCO Div. Overhead Door Corp.**

Facility ID:	0351010147
Permit Number:	P0107615
Permit Type:	Renewal
Issued:	3/25/2011
Effective:	3/25/2011
Expiration:	3/25/2016





Division of Air Pollution Control
Permit-to-Install and Operate
for
TODCO Div. Overhead Door Corp.

Table of Contents

Authorization ..... 1
A. Standard Terms and Conditions ..... 3
1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4
2. Who is responsible for complying with this permit? ..... 4
3. What records must I keep under this permit? ..... 4
4. What are my permit fees and when do I pay them?..... 4
5. When does my PTIO expire, and when do I need to submit my renewal application? ..... 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? ..... 5
7. What reports must I submit under this permit? ..... 5
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? ..... 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? ..... 5
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? ..... 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? ..... 6
13. Can I transfer this permit to a new owner or operator?..... 6
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? ..... 7
15. What happens if a portion of this permit is determined to be invalid? ..... 7
B. Facility-Wide Terms and Conditions..... 8
C. Emissions Unit Terms and Conditions ..... 10
1. P001, Wood Line #1..... 11
2. P002, Wood Line #2..... 15
3. Emissions Unit Group - paint booths: K003, K004,..... 19





## Authorization

Facility ID: 0351010147  
Application Number(s): A0041267  
Permit Number: P0107615  
Permit Description: This is a Renewal PTIO for (2) coating operations and (2) woodworking lines  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 3/25/2011  
Effective Date: 3/25/2011  
Expiration Date: 3/25/2016  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

TODCO Div. Overhead Door Corp.  
1295 Fairground Road East  
Marion, OH 43302

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

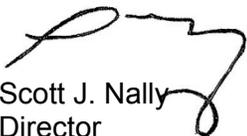
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office  
347 North Dunbridge Road  
Bowling Green, OH 43402  
(419)352-8461

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: P0107615  
Permit Description: This is a Renewal PTIO for (2) coating operations and (2) woodworking lines

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

**Emissions Unit ID: P001**  
Company Equipment ID: Wood Line #1  
Superseded Permit Number: P0087359  
General Permit Category and Type: Not Applicable

**Emissions Unit ID: P002**  
Company Equipment ID: Wood Line #2  
Superseded Permit Number: P0087359  
General Permit Category and Type: Not Applicable

**Group Name: paint booths**

<b>Emissions Unit ID:</b>	<b>K003</b>
Company Equipment ID:	Paint Booth #1
Superseded Permit Number:	P0087359
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K004</b>
Company Equipment ID:	Paint Booth #2
Superseded Permit Number:	P0087359
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, Northwest 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.

**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.

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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).

**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**

TODCO Div. Overhead Door Corp.

**Permit Number:** P0107615

**Facility ID:** 0351010147

**Effective Date:** 3/25/2011

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) None.

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

**1. P001, Wood Line #1**

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

Wood Line #1

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 (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(2)	See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)	2.23 lbs PE/hr, 9.77 tons PE/yr See b)(2)b.

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-35-07(B).

b. Best Available Technology (BAT) requirements for this emissions unit have been determined to be compliance with OAC rule 3745-17-07(A) and the terms and conditions of this permit.

c) Operational Restrictions

(1) None.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 6 inches of water.
- (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 a 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.

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.

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 a weekly.

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 the following information concerning the operations of the baghouse during the 12-month reporting period for this emissions unit;
  - 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 units) was/were in operation and process emissions were not vented to the baghouse;
  - c. each incident of deviation described in e)(2)a. (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in e)(2)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; and
  - e. each incident of deviation described in e)(2)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) Testing Requirements

- (1) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation: Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.  
  
Applicable Compliance Method: If required, the permittee shall demonstrate compliance with the visible emissions limitation pursuant to OAC rule 3745-17-03(B)(1).

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

TODCO Div. Overhead Door Corp.

**Permit Number:** P0107615

**Facility ID:** 0351010147

**Effective Date:** 3/25/2011

- b. Emission Limitations: 2.23 lbs PE/hr and 9.97 tons PE/yr

Applicable Compliance Method: The permittee shall demonstrate compliance with the hourly allowable PE limitation by multiplying the maximum baghouse outlet grain loading concentration of 0.02 gr/dscf by the baghouse's maximum volumetric air flow rate (13,000 acfm). This value is then converted to lbs/hr by multiplying lb/7000 grains and 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation pursuant to Methods 1-5 of 40 CFR, Part 60, Appendix A.

The tons/yr was established by multiplying the lbs/hr limit by a maximum operating schedule of 8760 hour/yr and tons/2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance will also be demonstrated with the annual limitation.

- g) Miscellaneous Requirements

- (1) None

**2. P002, Wood Line #2**

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

Wood Line No. 2

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 (PE) shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(2)	See b)(2)a.
c.	OAC rule 3745-31-05(A)(3)	0.02 grain (gr) PE/dry standard cubic foot (dscf), 2.23 lbs PE/hr, 9.77 tons PE/yr  See b)(2)b. and b)(2)c.

(2) Additional Terms and Conditions

a. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

b. Best Available Technology (BAT) for this emissions unit has been determined to be the use of a baghouse with a maximum outlet concentration of 0.02 gr/dscf.

c. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).

c) Operational Restrictions

None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to maintain compliance with the applicable emission limitations contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 1 to 6 inches of water.
- (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(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a 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.

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.

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 a weekly.

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 the following information concerning the operations of the baghouse during the 12-month reporting period for this emissions unit;
  - 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 units) was/were in operation and process emissions were not vented to the baghouse;
  - c. each incident of deviation described in e)(2)a. (above) where a prompt investigation was not conducted;
  - d. each incident of deviation described in e)(2)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; and
  - e. each incident of deviation described in e)(2)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) Testing Requirements

- (1) Compliance with the emission limitations in Section b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - a. Emission Limitations: 0.02 gr/dscf, 2.23 lbs PE/hr, 9.77 tons PE/yr

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

TODCO Div. Overhead Door Corp.

**Permit Number:** P0107615

**Facility ID:** 0351010147

**Effective Date:** 3/25/2011

Applicable Compliance Method: The 0.02 gr PE/dscf limit is the established maximum outlet grain loading concentration for the baghouse. The permittee shall demonstrate compliance with the lbs/hr limit by multiplying the maximum baghouse outlet grain loading concentration of 0.02 gr/dscf by the baghouse's maximum volumetric air flow rate (13,000 acfm). This value is then converted to lbs/hr by multiplying lb/7000 grains and 60 minutes/hour.

If required, compliance with the gr PE/dscf and lb/hr limitations shall be demonstrated in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

The tons/year limit was established by multiplying the lb/hr limit by a maximum operating schedule of 8760 hours/year and ton/2000 lbs. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be demonstrated with the annual limitation.

- b. Emission Limitation: Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance in accordance with OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) None.

**3. Emissions Unit Group - paint booths: K003, K004,**

EU ID	Operations, Property and/or Equipment Description
K003	paint booth no. 1 with drying ovens and dry filtration system
K004	paint booth no. 2 with drying ovens and dry filtration system

- 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. 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)b., b)(2)c., c)(3), d)(4), d)(6), e)(2), f(1)f., f(1)g. and f(1)i.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	26.25 lbs organic compounds (OC)/hr, from the coating operations [See b)(2)a. and b)(2)f.]  955 lbs OC/month and 5.73 tons OC/yr, from the solvent wipe/cleanup operations [See c)(1)]  See b)(2)b.
b.	OAC rule 3745-31-05(D)	42.00 tons of OC per rolling, 12-month period [See b)(2)c.i., c)(2) and c)(3)].  Annual HAP emissions resulting from the use of coatings and solvent wipe/cleanup materials in emissions units K003 and K004, combined, shall not exceed 10 tons per rolling 12-month period for any individual HAP or 25 tons per rolling 12-month period for any combination of HAPs. [See b)(2)c.ii.]

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

TODCO Div. Overhead Door Corp.

**Permit Number:** P0107615

**Facility ID:** 0351010147

**Effective Date:** 3/25/2011

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-21-07(G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day [See b)(2)d. and b)(2)e.
d.	OAC rule 3745-21-09(U)(1)(d)	3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit [See b)(2)f.]

(2) Additional Terms and Conditions

- a. This emissions unit is subject to 26.25 lbs OC/hr from coating operations at all times, except for when subject to OAC rule 3745-21-07(G)(2) as specified in section b)(2)d. Upon revision of OAC rule 3745-21-07(G)(2) [See b)(2)d.], the 26.25 lbs OC/hr emission limitation established pursuant to OAC rule 3745-31-05(A)(3) shall cover all coating operations at all times.
- b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(U)(1)(d), OAC rule 3745-21-07(G)(2) and OAC rule 3745-31-05(D).
- c. The permittee has requested the following federally enforceable emission limitations for purposes of avoiding Title V applicability:
  - i. 42.00 tons OC per rolling 12-month period based on coating content and usage restrictions. (See c)(2) and c)(3))  
  
For purposes of federal enforceability, limitations on OC's effectively limit emissions of VOCs.
  - ii. Annual HAP emissions resulting from the use of coatings and solvent wipe/cleanup materials in emissions units K003 and K004, combined, shall not exceed 10 tons per rolling, 12-month period for any individual HAP or 25 tons per rolling 12-month period for any combination of HAPs.
- d. This emissions unit becomes subject to OAC rule 3745-21-07(G)(2) for each day when any photochemically reactive material is applied to any non-metal substrate. On any such day, all emissions from both the application of photochemically reactive and non-photochemically reactive materials (coatings) on non-metal substrates is applicable to the requirement that OC emissions shall not exceed 8 pounds per hour and 40 pounds per day.
- e. 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)c., b)(2)d., c)(1), d)(1), d)(2), d)(5)b., e)(3), e)(4), and f)(1)d.

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:

None.

- f. This emissions unit becomes subject to OAC rule 3745-21-09(U)(d)(1) when a coating is applied to a metal substrate.
- g. The hourly OC emission limitation was established for PTI purposes to reflect the emissions unit's potential to emit. Therefore, no record keeping, monitoring, or reporting requirements are necessary to ensure compliance with this limitation.

c) Operational Restrictions

- (1) The use of any photochemically reactive material for solvent wipe/cleanup operations in this emissions unit is prohibited. Photochemically reactive material is defined in OAC rule 3745-21-01(C)(5).
- (2) The OC content of any coating employed in this emissions unit shall not exceed 3.50 lbs per gallon, as applied.
- (3) The maximum annual coating usage rate for this emissions unit shall not exceed 24,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates. This emissions unit has been in operation for more than 12 months and, as such the permittee has existing records to generate the rolling, 12-month summation of the coating usage rate upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records that document whether or not each coating employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).
- (2) On any day when any photochemically reactive material is applied to any non-metal substrate, the permittee shall collect and record the following information for this emissions unit for such day:
  - a. the company name and identification for each coating employed on a non-metal substrate;
  - b. the number of gallons of each coating applied on a non-metal substrate;
  - c. the organic compound content of each coating, in pounds/gallon, as applied on any non-metal substrate;

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

TODCO Div. Overhead Door Corp.

**Permit Number:** P0107615

**Facility ID:** 0351010147

**Effective Date:** 3/25/2011

- d. the total organic compound emission rate for all coatings applied on a non-metal substrate, in pounds per day [d)(2)b. x d)(2)c.];
- e. the total number of hours the emissions unit was involved in the operation of coating of non-metal substrates;
- f. the average hourly organic compound emission rate involving the operation of coating non-metal substrates [d)(2)d. / d)(2)e.], in pounds per hour (average).

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

- (3) The permittee shall collect and record the following information when any coating is applied to a metal substrate:
  - a. the company name and identification for each coating employed on a metal substrate;
  - b. the VOC content of each coating (excluding water and exempt solvents), in pounds per gallon, employed on any metal substrate. The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for CVOC,2.
- (4) In conjunction with the coating information required above, the permittee shall collect and record the following information each month for all coatings employed in this emissions unit:
  - a. the name and identification number of each coating employed;
  - b. the OC content of each coating, as applied, in pounds per gallon;
  - c. the number of gallons of each coating employed;
  - d. the total number of gallons of all coatings employed [summation of d)(4)c.];
  - e. the annual coating usage for all coatings employed, based upon a rolling 12-month summation of the monthly usage rates;
  - f. the OC emission rate for each coating [d)(4)b. x d)(4)c.], in pounds per month;
  - g. the total OC emission rate for all coatings [summation of d)(4)f.], in pounds or tons per month; and
  - h. the annual OC emissions from all coatings, based upon a rolling 12-month summation of the monthly OC emissions.
- (5) The permittee shall collect and record the following each month for solvent wipe/cleanup operations:

- a. the name and identification of each solvent wipe/cleanup material employed;
- b. documentation as to whether or not each solvent wipe/cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
- c. the OC content of each solvent wipe/cleanup material employed, in pounds per gallon;
- d. the number of gallons of each solvent wipe/cleanup material employed;
- e. the OC emissions from each solvent wipe/cleanup material employed [d)(5)c. x d)(5)d.], in pounds per month;
- f. the total OC emissions from all solvent wipe/cleanup materials employed [summation of d)(5)e. for each calendar month to date from January to December].

The company may calculate OC emissions from solvent wipe/cleanup operations in accordance with the following formula if waste solvent wipe/cleanup materials are sent off-site for reclamation/disposal:

OC emissions for solvent wipe/cleanup operations = (total gallons of solvent wipe/cleanup material used x solvent density of solvent wipe/cleanup material) – (total gallons solvent wipe/cleanup material sent off-site for disposal or reclamation [minus solids content of said material]) x solvent density.

- (6) The permittee shall collect and record the following HAP information each month for emission units K003 and K004, combined:
  - a. the company identification of each coating and solvent wipe/cleanup material employed;
  - b. the amount of each individual HAP in each coating and solvent wipe/cleanup material, in lbs/gallon, as applied;
  - c. the number of gallons of each coating and solvent wipe/cleanup material employed;
  - d. the emission rate for each individual HAP from each coating and solvent wipe/cleanup material employed [d)(6)b. x d)(6)c.] in lbs/month;
  - e. the total emission rate for each individual HAP from all coatings and solvent wipe/cleanup materials employed [summation of d)(5)d.] for each individual HAP), in lbs/month;
  - f. the total HAP emission rate for all HAPs combined from all coatings and solvent wipe/cleanup materials employed [summation of d)(5)e. for all HAPs], in lbs/month; and
  - g. the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of monthly emissions.

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

TODCO Div. Overhead Door Corp.

**Permit Number:** P0107615

**Facility ID:** 0351010147

**Effective Date:** 3/25/2011

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

- (7) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the ISC-AEROMOD PRIME (version 4.60) model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the ISC-AEROMOD PRIME (version 4.60) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Methyl N-Amyl Keytone

TLV (mg/m3): 233,497

Maximum Hourly Emission Rate (lbs/hr): 8.70 (point and fugitive combined for K003-K004)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1968.07

MAGLC (ug/m3): 5559

- (8) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will be satisfied. If upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACHIG's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

- (9) If the permittee determines that the “Air Toxic Policy” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a “modification” under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a “modification” under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the “Air Toxic Policy”:

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the “Air Toxic Policy” for the change.

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 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. any exceedances of the 42.00 tons OC per rolling 12-month period as specified in section b)(2)c.i.
    - ii. any exceedances of the maximum annual coating usage rate not to exceed 24,000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.
    - iii. any exceedances of the rolling individual HAP and combined HAPs emission limitations specified in section b)(2)c.ii.
  - 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 appropriate District Office or local air agency).

- (3) The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings (coating that exceeded the 3.50 lbs of VOC/gallon excluding water and exempt solvents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month

f) Testing Requirements

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

- a. Emission Limitation: 26.25 lbs OC/hr from coating operation

Applicable Compliance Method: The hourly emission limitation represents the potential to emit\* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

\*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 7.5 gallons per hour and a maximum OC content of 3.5 pounds per gallon.

- b. Emission Limitation: 955 lbs OC/month from solvent wipe/cleanup operations

Applicable Compliance Method: Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section d)(5).

- c. Emission Limitation: 5.73 tons VOC/year from solvent wipe/cleanup operations

Applicable Compliance Method: Compliance with the above emission limitation shall be based upon the record keeping requirements specified in section d)(5).

- d. Emission Limitations: OC emissions shall not exceed 8 pounds per hour and 40 pounds per day

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section d)(2).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 4, and 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

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

TODCO Div. Overhead Door Corp.

**Permit Number:** P0107615

**Facility ID:** 0351010147

**Effective Date:** 3/25/2011

- e. Emission Limitation: 3.5 pounds VOC per gallon of coating, excluding water and exempt solvents, for coatings dried at temperatures not exceeding 200 degrees Fahrenheit

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section d)(3). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

- f. Emission Limitation: 42.00 tons of OC per rolling, 12-month period

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section d)(4).

- g. Emission Limitation: Annual HAP emissions resulting from the use of coatings and solvent wipe/cleanup materials in emissions units K003 and K004, combined, shall not exceed 10 tons per rolling, 12-month period for any individual HAP, or 25 tons per rolling, 12-month period for any combination of HAPs.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section d)(6).

- h. Emission Limitation: The OC content of any coating employed in this emissions unit shall not exceed 3.50 lbs per gallon, as applied.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section d)(4)b.

- i. Emission Limitation: The maximum annual coating usage rate for this emissions unit shall not exceed 24, 000 gallons, based upon a rolling, 12-month summation of the monthly coating usage rates.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements in section d)(4)e.

g) Miscellaneous Requirements

- (1) None.