

Synthetic Minor Determination and/or Netting Determination

Permit To Install: **02-22054**

A. Source Description:

Schrocks' Woodcraft is a manufacturer and finisher of wood furniture and cabinets. (SIC 2511) This action is a permit to install one new wood furniture spray coating operation, emissions unit R010. It also re-establishes limits on the existing six spray coating operations for the purpose of reducing the facility-wide Potential to Emit below the Title V thresholds and the MACT Subpart JJ, Wood Furniture Manufacturing.

B. Facility Emissions and Attainment Status

The facility is located in Wayne County, which is attainment for all criteria pollutants. The facility emits VOC and HAPs from seven furniture finishing spray coating operations, and particulate emissions from woodworking operations. The facility also includes a small natural gas backup boiler and one wood waste boiler.

Current actual VOC emissions from the existing six coating operations and boilers were 28.0 tons during 2005. The federally enforceable, facility-wide Potentials to Emit exceed the thresholds for Title V, and MACT Subpart JJ. Current federally enforceable PTEs are 181.03 tons of VOC emissions, 10.1 tons of single HAP and 17.48 tons of combined HAPs.

C. Source Emissions

R004 - off line manual top coat spray booth to finish wood furniture originally installed November, 1992. Parts air dried and manually moved. The emissions unit does not use photochemically reactive coatings and is not subject to OAC rule 3745-21-07(G)(2). The emissions unit was previously issued a federally enforceable limit of 15.42 TPY under PTI 02-11354, issued March 11, 1998.

R005 - off line manual stain spray booth and hand wiping to finish wood furniture originally installed November, 1992. Parts air dried and manually moved. The emissions unit does not use photochemically reactive coatings and is not subject to OAC rule 3745-21-07(G)(2). The emissions unit was previously issued a federally enforceable limit of 18.0 TPY under PTI 02-11354, issued March 11, 1998.

R006 - top coat spray booth 2, one manual spray gun/pump, associated drying oven and conveyor system to finish wood furniture originally installed November, 1992. The emissions unit does not use photochemically reactive coatings and is not subject to OAC rule 3745-21-07(G)(2). The emissions unit was previously issued a federally enforceable limit of 15.42 TPY under PTI 02-11354, issued March 11, 1998.

R007 - top coat spray booth 1, one manual spray gun/pump, associated drying oven and conveyor system to finish wood furniture originally installed November, 1992. The emissions unit does not use photochemically reactive coatings and is not subject to OAC rule 3745-21-07(G)(2). The emissions unit was previously issued a federally enforceable limit of 15.42 TPY under PTI 02-11354, issued March 11, 1998.

R008 - sealer coat spray booth, one manual spray gun/pump, associated drying oven and conveyor system to finish wood furniture originally installed November, 1992. The emissions unit does not use photochemically reactive coatings and is not subject to OAC rule 3745-21-07(G)(2). The emissions unit was previously issued a federally enforceable limit of 17.28 TPY under PTI 02-11354, issued March 11, 1998.

R009 - stain spray booth 1, one manual spray gun/pump and manual wiping, associated drying oven and conveyor system to finish wood furniture originally installed November, 1992. The emissions unit does not use photochemically reactive coatings and is not subject to OAC rule 3745-21-07(G)(2). The emissions unit was previously issued a federally enforceable limit of 18.0 TPY under PTI 02-11354, issued March 11, 1998.

R010 - off line manual spray booth to finish oversized wood pieces. The unit is not yet installed. The emissions unit does not use photochemically reactive coatings and is not subject to OAC rule 3745-21-07(G)(2).

Boiler emissions are included in the tables below.

The federally enforceable potential to emit for this facility:

EU	VOC (TPY)	combined HAP (TPY)	single HAP (TPY)
R004	15.42	1.29	1.14
R005	18.0	3.30	1.41
R006	15.42	1.29	1.14
R007	15.42	1.29	1.14
R008	17.28	2.97	1.11
R009	18.0	1.68	1.44
R010	80.29	5.66	2.75
exempt boilers/heater/NG ovens	1.20	0	0
Total	181.03	17.48	10.13

The potential to emit including the federally enforceable limits in this PTI:

EU	VOC (TPY)	combined HAP (TPY)	single HAP (TPY)
R004, R005, R006, R007, R008, R009 and R010, combined	97.5	24.5	9.5
boilers	1.20	0	0
Total	98.7	24.5	9.5

D. Conclusion

The permit includes federally enforceable limits for the coating VOC emissions, and coating HAP emissions, as a rolling, 12-month summation and the associated monthly record keeping and quarterly reporting. The limits in this PTI are sufficient to reduce the facility's PTE for VOC below the Title V thresholds and to reduce the facility's PTE for HAPs below the Title V and MACT Subpart JJ thresholds.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
HOLMES COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 02-22054

Fac ID: 0238000150

DATE: 7/13/2006

Schrocks Woodcrafts, Inc.
Scott Bobst
559 State Route 39 East
Bellville, OH 44813

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

NEDO

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **02-22054** FOR AN AIR CONTAMINANT SOURCE FOR
Schrocks Woodcrafts, Inc.

On 7/13/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Schrocks Woodcrafts, Inc.**, located at **2260 State Route 39, Walnut Creek, Ohio.**

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-22054:

Paint Spray booth.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087
[(330)425-9171]



STATE OF OHIO ENVIRONMENTAL PROTECTION
AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 02-22054

Application Number: 02-22054
Facility ID: 0238000150
Permit Fee: **To be entered upon final issuance**
Name of Facility: Schrocks Woodcrafts, Inc.
Person to Contact: Scott Bobst
Address: 559 State Route 39 East
Bellville, OH 44813

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2260 State Route 39
Walnut Creek, Ohio**

Description of proposed emissions unit(s):
Paint Spray booth.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Schrocks Woodcrafts, Inc.

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PTI Application: 02-22054

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

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reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the

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permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of

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the Ohio EPA. Progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
- ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of

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installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Schrocks Woodcrafts, Inc.**Facility ID: 0238000150****PTI Application: 02-22054****Issued: To be entered upon final issuance****C. Permit-To-Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	97.5 (2.04 decrease)
single HAP	9.5 (2.09 increase)
combined HAP	24.5 (12.69 increase)

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (R004) - off line manual top coat spray booth to finish wood furniture. Parts air dried and manually moved.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.b, A.2.c and B.1 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
OAC rule 3745-21-07(G)(2)	See section A.2.a below.
OAC rule 3745-31-05(C)	See sections A.2.d, A.2.e and B.2 below.

2. Additional Terms and Conditions

- 2.a No photochemically reactive materials (coatings and cleanup materials), as defined in OAC rule 3745-21-01(C)(5), shall be employed in this emissions unit.
- 2.b The volatile organic compound (VOC) emissions from all the coatings shall not exceed 20.97 pounds per hour. [This limit is based upon the maximum application rate of 3.0 gallons per hour.]
- 2.c The VOC content of each coating shall not exceed 6.99 pounds per gallon, as applied.
- 2.d The hazardous air pollutant (HAP) emissions from all the coatings and cleanup materials for emissions units R004, R005, R006, R007, R008, R009 and R010, combined, shall not exceed 9.5 tons of any single HAP per rolling, 12-month period, or 24.5 tons of total, combined HAPs per rolling, 12-month period.
- 2.e The VOC emissions from all the coatings and cleanup materials shall not exceed 91.99 tons per year from this emissions unit, and shall not exceed 97.5 tons per rolling, 12-month period for emissions units R004, R005, R006, R007, R008,

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R009 and R010, combined.

Emissions Unit ID: **R004**

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
2. The maximum emissions from the coatings and cleanup materials usage for emissions units R004, R005, R006, R007, R008, R009 and R010, combined, shall not exceed 97.5 tons of VOC, 9.5 tons of a single HAP or 24.5 tons of total, combined HAPs per rolling, 12-month period. The permittee has existing coating and clean up material usage records such that there is no need for first year monthly VOC emission limitations.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each day for the emissions unit:
 - a. the company identification for each coating or cleanup material employed;
 - b. documentation on whether or not each material employed (coating and cleanup) was a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. the VOC content of each coating, in lbs/gallon, as applied;
 - d. the number of gallons of each coating employed minus the number of gallons of each coating recovered for disposal;
 - e. the total VOC emissions from all the coatings employed, in lbs/day, i.e., sum of (c) times (d);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly VOC emission rate for all the coatings, i.e., (e)/(f), in lbs/hr.

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

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3. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the number of gallons of cleanup material employed minus the number of gallons of cleanup material recovered for disposal;
 - b. the VOC content of each cleanup material, in lbs/gallon;
 - c. the total VOC emissions from all cleanup materials employed, in lbs/month, i.e., sum of (b) times (a); and
 - d. the actual VOC emissions from all the coatings and cleanup materials employed, in tons, i.e., [(the summation of the daily VOC emissions, from section C.2.e, for the calendar month + the monthly cleanup material VOC emissions from section C.3.c) divided by 2000 lbs/ton].
4. The permittee shall calculate and record the following VOC information for each month for emissions units R004 through R010, combined:
 - a. the total VOC emissions for all the coatings and cleanup materials employed, in tons (calculated by summing the total VOC emissions recorded in section C.4.d for each emissions unit); and
 - b. the total VOC emissions for the previous, 12-month period, in tons.
5. The permittee shall calculate and record the following HAP information for each month for emissions units R004 through R010, combined:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the single HAP (see notes below) content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon of coating, as applied;
 - d. the total single HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month, i.e., for each HAP the sum of (b) times (c) for each coating and cleanup material, divided by 2000;

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- e. the rolling, 12-month summation of the emissions of each single HAP for the previous 12-month period, i.e., the summation of (d) in tons per rolling, 12-month period;
- f. the total, combined HAPs (see notes below) content for all HAPs of each coating and cleanup material, in pounds of total, combined HAPs per gallon of coating, as applied;
- g. the total, combined HAPs emissions from all coatings and cleanup materials employed, in tons per month, i.e., the sum of (b) times (f) for each coating and cleanup material, divided by 2000; and
- h. the rolling, 12-month summation of the emissions of total, combined HAPs for the previous 12-month period, i.e., the summation of (g) in tons per rolling, 12-month period.

[Note 1: A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.]

[Note 2: Any determination of the HAP content of any coating or cleanup material shall be based on the coating or cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings or cleanup materials by formulation data supplied by the manufacturer of the coatings or cleanup materials, or from data determined by an analysis of each coating or cleanup material, as applied.]

- 6. The permit to install for this emissions unit [R004] and emissions units R004, R005, R006, R007, R008, R009 and R010, combined, 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 SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for

Emissions Unit ID: **R004**

emissions units R004, R005, R006, R007, R008, R009 and R010, combined:

Pollutant: n-butyl alcohol

TLV (mg/m³): 60.6

Maximum Hourly Emission Rate (lbs/hr): 22.7

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 451.7MAGLC (ug/m³): 14,428

7. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be 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' (ACGIH'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.).

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

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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.

8. 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.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Northeast District Office in writing of any daily record showing that 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 Ohio EPA, Northeast District Office within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. each day during which the average VOC emissions from the coatings exceeded the pounds per hour limitation, and the actual average VOC emissions for each such day;
 - b. each day during which the VOC content of any coating exceeded the pounds per gallon limitation, and the actual VOC content of each such coating employed;
 - c. all exceedances of the rolling, 12-month VOC emission limitation for this emissions unit and emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual VOC emissions during each such period;
 - d. any exceedance of the rolling, 12-month emission limitation for each single HAP

Emissions Unit ID: **R004**

from emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual single HAP emissions during each such period; and

- e. any exceedence of the rolling, 12-month emission limitation for total, combined HAPs from emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual total, combined HAPs emissions during each such period.

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

3. The permittee shall also submit annual reports that summarize the actual annual emissions of VOC, from this emissions unit and the maximum single HAP emissions and total, combined HAP emissions from emissions units R004, R005, R006, R007, R008, R009 and R010, combined. The reports shall include the emissions calculations and shall be submitted by January 31 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

20.97 pounds VOC emissions per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be determined based upon the record keeping requirements specified in section C.2 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 1 through 4 and Method 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

91.99 tons per year of VOC emissions from this emissions unit and 97.5 tons of

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VOC emissions per rolling, 12-month period from all the coatings and cleanup materials, for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in sections C.2, C.3 and C.4 of this permit.

c. Emission Limitation:

6.99 pounds of VOC per gallon coating, as applied

Applicable Compliance Method:

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.

d. Emission Limitation:

9.5 tons of each single HAP, based upon a rolling, 12-month summation for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in section C.5.e.

Emissions Unit ID: **R004**

e. Emission Limitation:

24.5 tons of each total combined HAPs, based upon a rolling, 12-month summation for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in section C.5.h.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.6, C.7 and C.8.
2. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emissions unit contained in permit to install 02-11354 as issued on March 11, 1998.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (R005) - off line manual stain spray booth to finish wood furniture. Parts air dried and manually moved.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.b, A.2.c and B.1 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
OAC rule 3745-21-07(G)(2)	See section A.2.a below.
OAC rule 3745-31-05(C)	See sections A.2.d, A.2.e and B.2 below.

2. Additional Terms and Conditions

- 2.a No photochemically reactive materials (coatings and cleanup materials), as defined in OAC rule 3745-21-01(C)(5), shall be employed in this emissions unit.
- 2.b The volatile organic compound (VOC) emissions from all the coatings shall not exceed 20.97 pounds per hour. [This limit is based upon the maximum application rate of 3.0 gallons per hour.]
- 2.c The VOC content of each coating shall not exceed 6.99 pounds per gallon, as applied.
- 2.d The hazardous air pollutant (HAP) emissions from all the coatings and cleanup materials for emissions units R004, R005, R006, R007, R008, R009 and R010, combined, shall not exceed 9.5 tons of any single HAP per rolling, 12-month period, or 24.5 tons of total, combined HAPs per rolling, 12-month period.
- 2.e The VOC emissions from all the coatings and cleanup shall not exceed 91.99 tons per year materials from this emissions unit, and shall not exceed 97.5 tons

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per rolling, 12-month period for emissions units R004, R005, R006, R007, R008, R009 and R010, combined.

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
2. The maximum emissions from the coatings and cleanup materials usage for emissions units R004, R005, R006, R007, R008, R009 and R010, combined, shall not exceed 97.5 tons of VOC, 9.5 tons of a single HAP or 24.5 tons of total, combined HAPs per rolling, 12-month period. The permittee has existing coating and clean up material usage records such that there is no need for first year monthly VOC emission limitations.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each day for the emissions unit:
 - a. the company identification for each coating or cleanup material employed;
 - b. documentation on whether or not each material employed (coating and cleanup) was a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. the VOC content of each coating, in lbs/gallon, as applied;
 - d. the number of gallons of each coating employed minus the number of gallons of each coating recovered for disposal;
 - e. the total VOC emissions from all the coatings employed, in lbs/day, i.e., sum of (c) times (d);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly VOC emission rate for all the coatings, i.e., (e)/(f), in lbs/hr.

Emissions Unit ID: **R005**

[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).]

3. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the number of gallons of cleanup material employed minus the number of gallons of cleanup material recovered for disposal;
 - b. the VOC content of each cleanup material, in lbs/gallon;
 - c. the total VOC emissions from all cleanup materials employed, in lbs/month, i.e., sum of (b) times (a); and
 - d. the actual VOC emissions from all the coatings and cleanup materials employed, in tons, i.e., [(the summation of the daily VOC emissions, from section C.2.e, for the calendar month + the monthly cleanup material VOC emissions from section C.3.c) divided by 2000 lbs/ton].
4. The permittee shall calculate and record the following VOC information for each month for emissions units R004 through R010, combined:
 - a. the total VOC emissions for all the coatings and cleanup materials employed, in tons (calculated by summing the total VOC emissions recorded in section C.4.d for each emissions unit); and
 - b. the total VOC emissions for the previous, 12-month period, in tons.
5. The permittee shall calculate and record the following HAP information for each month for emissions units R004 through R010, combined:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the single HAP (see notes below) content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon of coating, as applied;
 - d. the total single HAP emissions for each HAP from all coatings and cleanup

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- materials employed, in tons per month, i.e., for each HAP the sum of (b) times (c) for each coating and cleanup material, divided by 2000;
- e. the rolling, 12-month summation of the emissions of each single HAP for the previous 12-month period, i.e., the summation of (d) in tons per rolling, 12-month period;
 - f. the total, combined HAPs (see notes below) content for all HAPs of each coating and cleanup material, in pounds of total, combined HAPs per gallon of coating, as applied;
 - g. the total, combined HAPs emissions from all coatings and cleanup materials employed, in tons per month, i.e., the sum of (b) times (f) for each coating and cleanup material, divided by 2000; and
 - h. the rolling, 12-month summation of the emissions of total, combined HAPs for the previous 12-month period, i.e., the summation of (g) in tons per rolling, 12-month period.

[Note 1: A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.]

[Note 2: Any determination of the HAP content of any coating or cleanup material shall be based on the coating or cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings or cleanup materials by formulation data supplied by the manufacturer of the coatings or cleanup materials, or from data determined by an analysis of each coating or cleanup material, as applied.]

- 6. The permit to install for this emissions unit [R005] and emissions units R004, R005, R006, R007, R008, R009 and R010, combined, 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 SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0

Emissions Unit ID: R005

(or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for emissions units R004, R005, R006, R007, R008, R009 and R010, combined:

Pollutant: n-butyl alcohol

TLV (mg/m3): 60.6

Maximum Hourly Emission Rate (lbs/hr): 22.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.7

MAGLC (ug/m3): 14,428

7. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be 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' (ACGIH'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.).

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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.

8. 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.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Northeast District Office in writing of any daily record showing that 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 Ohio EPA, Northeast District Office within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. each day during which the average VOC emissions from the coatings exceeded the pounds per hour limitation, and the actual average VOC emissions for each such day;
 - b. each day during which the VOC content of any coating exceeded the pounds per gallon limitation, and the actual VOC content of each such coating employed;
 - c. all exceedances of the rolling, 12-month VOC emission limitation for this emissions unit and emissions units R004, R005, R006, R007, R008, R009 and

Emissions Unit ID: R005

R010, combined, and the actual VOC emissions during each such period;

- d. any exceedence of the rolling, 12-month emission limitation for each single HAP from emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual single HAP emissions during each such period; and
- e. any exceedence of the rolling, 12-month emission limitation for total, combined HAPs from emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual total, combined HAPs emissions during each such period.

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

3. The permittee shall also submit annual reports that summarize the actual annual emissions of VOC, from this emissions unit and the maximum single HAP emissions and total, combined HAP emissions from emissions units R004, R005, R006, R007, R008, R009 and R010, combined. The reports shall include the emissions calculations and shall be submitted by January 31 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

20.97 pounds VOC emissions per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be determined based upon the record keeping requirements specified in section C.2 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 1 through 4 and Method 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

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b. Emission Limitations:

91.99 tons per year of VOC emissions from this emissions unit and 97.5 tons of VOC emissions per rolling, 12-month period from all the coatings and cleanup materials, for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in sections C.2, C.3 and C.4 of this permit.

c. Emission Limitation:

6.99 pounds of VOC per gallon coating, as applied

Applicable Compliance Method:

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.

d. Emission Limitation:

9.5 tons of each single HAP, based upon a rolling, 12-month summation for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Emissions Unit ID: R005

Compliance shall be demonstrated based on the record keeping requirements specified in section C.5.e.

e. Emission Limitation:

24.5 tons of each total, combined HAPs, based upon a rolling, 12-month summation for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in section C.5.h.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.6, C.7 and C.8.
2. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emissions unit contained in permit to install 02-11354 as issued on March 11, 1998.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (R006) - top coat spray booth 2, one manual spray gun/pump, associated drying oven and conveyor system to finish wood furniture

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.b, A.2.c and B.1 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
OAC rule 3745-21-07(G)(2)	See section A.2.a below.
OAC rule 3745-31-05(C)	See sections A.2.d, A.2.e and B.2 below.

2. Additional Terms and Conditions

- 2.a No photochemically reactive materials (coatings and cleanup materials), as defined in OAC rule 3745-21-01(C)(5), shall be employed in this emissions unit.
- 2.b The volatile organic compound (VOC) emissions from all the coatings shall not exceed 18.30 pounds per hour. [This limit is based upon the maximum application rate of 3.0 gallons per hour.]
- 2.c The VOC content of each coating shall not exceed 6.10 pounds per gallon, as applied.
- 2.d The hazardous air pollutant (HAP) emissions from all the coatings and cleanup materials for emissions units R004, R005, R006, R007, R008, R009 and R010, combined, shall not exceed 9.5 tons of any single HAP per rolling, 12-month period, or 24.5 tons of total, combined HAPs per rolling, 12-month period.
- 2.e The VOC emissions from all the coatings and cleanup materials shall not exceed 80.29 tons per year from this emissions unit, and shall not exceed 97.5 tons per

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rolling, 12-month period for emissions units R004, R005, R006, R007, R008, R009 and R010, combined.

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
2. The maximum emissions from the coatings and cleanup materials usage for emissions units R004, R005, R006, R007, R008, R009 and R010, combined, shall not exceed 97.5 tons of VOC, 9.5 tons of a single HAP or 24.5 tons of total, combined HAPs per rolling, 12-month period. The permittee has existing coating and clean up material usage records such that there is no need for first year monthly VOC emission limitations.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each day for the emissions unit:
 - a. the company identification for each coating or cleanup material employed;
 - b. documentation on whether or not each material employed (coating and cleanup) was a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. the VOC content of each coating, in lbs/gallon, as applied;
 - d. the number of gallons of each coating employed minus the number of gallons of each coating recovered for disposal;
 - e. the total VOC emissions from all the coatings employed, in lbs/day, i.e., sum of (c) times (d);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly VOC emission rate for all the coatings, i.e., (e)/(f), in lbs/hr.

Emissions Unit ID: **R006**

[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).]

3. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the number of gallons of cleanup material employed minus the number of gallons of cleanup material recovered for disposal;
 - b. the VOC content of each cleanup material, in lbs/gallon;
 - c. the total VOC emissions from all cleanup materials employed, in lbs/month, i.e., sum of (b) times (a); and
 - d. the actual VOC emissions from all the coatings and cleanup materials employed, in tons, i.e., [(the summation of the daily VOC emissions, from section C.2.e, for the calendar month + the monthly cleanup material VOC emissions from section C.3.c) divided by 2000 lbs/ton].
4. The permittee shall calculate and record the following VOC information for each month for emissions units R004 through R010, combined:
 - a. the total VOC emissions for all the coatings and cleanup materials employed, in tons (calculated by summing the total VOC emissions recorded in section C.4.d for each emissions unit); and
 - b. the total VOC emissions for the previous, 12-month period, in tons.
5. The permittee shall calculate and record the following HAP information for each month for emissions units R004 through R010, combined:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the single HAP (see notes below) content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon of coating, as applied;
 - d. the total single HAP emissions for each HAP from all coatings and cleanup

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- materials employed, in tons per month, i.e., for each HAP the sum of (b) times (c) for each coating and cleanup material, divided by 2000;
- e. the rolling, 12-month summation of the emissions of each single HAP for the previous 12-month period, i.e., the summation of (d) in tons per rolling, 12-month period;
 - f. the total, combined HAPs (see notes below) content for all HAPs of each coating and cleanup material, in pounds of total, combined HAPs per gallon of coating, as applied;
 - g. the total, combined HAPs emissions from all coatings and cleanup materials employed, in tons per month, i.e., the sum of (b) times (f) for each coating and cleanup material, divided by 2000; and
 - h. the rolling, 12-month summation of the emissions of total, combined HAPs for the previous 12-month period, i.e., the summation of (g) in tons per rolling, 12-month period.

[Note 1: A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.]

[Note 2: Any determination of the HAP content of any coating or cleanup material shall be based on the coating or cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings or cleanup materials by formulation data supplied by the manufacturer of the coatings or cleanup materials, or from data determined by an analysis of each coating or cleanup material, as applied.]

- 6. The permit to install for this emissions unit [R006] and emissions units R004, R005, R006, R007, R008, R009 and R010, combined, 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 SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0

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(or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for emissions units R004, R005, R006, R007, R008, R009 and R010, combined:

Pollutant: n-butyl alcohol

TLV (mg/m3): 60.6

Maximum Hourly Emission Rate (lbs/hr): 22.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 451.7

MAGLC (ug/m3): 14,428

7. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be 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' (ACGIH'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.).

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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.

8. 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.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Northeast District Office in writing of any daily record showing that 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 Ohio EPA, Northeast District Office within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. each day during which the average VOC emissions from the coatings exceeded the pounds per hour limitation, and the actual average VOC emissions for each such day;
 - b. each day during which the VOC content of any coating exceeded the pounds per gallon limitation, and the actual VOC content of each such coating employed;
 - c. all exceedances of the rolling, 12-month VOC emission limitation for this emissions unit and emissions units R004, R005, R006, R007, R008, R009 and

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R010, combined, and the actual VOC emissions during each such period;

- d. any exceedence of the rolling, 12-month emission limitation for each single HAP from emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual single HAP emissions during each such period; and
- e. any exceedence of the rolling, 12-month emission limitation for total, combined HAPs from emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual total, combined HAPs emissions during each such period.

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

- 3. The permittee shall also submit annual reports that summarize the actual annual emissions of VOC, from this emissions unit and the maximum single HAP emissions and total, combined HAP emissions from emissions units R004, R005, R006, R007, R008, R009 and R010, combined. The reports shall include the emissions calculations and shall be submitted by January 31 of each year, and shall cover the previous calendar year.

E. Testing Requirements

- 1. Compliance with the allowable emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

18.30 pounds VOC emissions per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be determined based upon the record keeping requirements specified in section C.2 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 1 through 4 and Method 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Emissions Unit ID: **R006**

b. Emission Limitations:

80.29 tons per year of VOC emissions from this emissions unit and 97.5 tons of VOC emissions per rolling, 12-month period from all the coatings and cleanup materials, for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in sections C.2, C.3 and C.4 of this permit.

c. Emission Limitation:

6.10 pounds of VOC per gallon coating, as applied

Applicable Compliance Method:

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.

d. Emission Limitation:

9.5 tons of each single HAP, based upon a rolling, 12-month summation for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

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Compliance shall be demonstrated based on the record keeping requirements specified in section C.5.e.

e. Emission Limitation:

24.5 tons of each total, combined HAPs, based upon a rolling, 12-month summation for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in section C.5.h.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.6, C.7 and C.8.
2. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emissions unit contained in permit to install 02-11354 as issued on March 11, 1998.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R007) - top coat spray booth 1, one manual spray gun/pump, associated drying oven and conveyor system to finish wood furniture

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.b, A.2.c and B.1 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
OAC rule 3745-21-07(G)(2)	See section A.2.a below.
OAC rule 3745-31-05(C)	See section A.2.d, A.2.e and B.2 below.

2. Additional Terms and Conditions

- 2.a No photochemically reactive materials (coatings and cleanup materials), as defined in OAC rule 3745-21-01(C)(5), shall be employed in this emissions unit.
- 2.b The volatile organic compound (VOC) emissions from all the coatings shall not exceed 18.30 pounds per hour. [This limit is based upon the maximum application rate of 3.0 gallons per hour.]
- 2.c The VOC content of each coating shall not exceed 6.10 pounds per gallon, as applied.
- 2.d The hazardous air pollutant (HAP) emissions from all the coatings and cleanup materials for emissions units R004, R005, R006, R007, R008, R009 and R010, combined, shall not exceed 9.5 tons of any single HAP per rolling, 12-month period, or 24.5 tons of total, combined HAPs per rolling, 12-month period.
- 2.e The VOC emissions from all the coatings and cleanup materials shall not exceed 80.29 tons per year from this emissions unit, and shall not exceed 97.5 tons per rolling, 12-month period for emissions units R004, R005, R006, R007, R008,

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R009 and R010, combined.

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
2. The maximum emissions from the coatings and cleanup materials usage for emissions units R004, R005, R006, R007, R008, R009 and R010, combined, shall not exceed 97.5 tons of VOC, 9.5 tons of a single HAP or 24.5 tons of total, combined HAPs per rolling, 12-month period. The permittee has existing coating and clean up material usage records such that there is no need for first year monthly VOC emission limitations.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each day for the emissions unit:
 - a. the company identification for each coating or cleanup material employed;
 - b. documentation on whether or not each material employed (coating and cleanup) was a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. the VOC content of each coating, in lbs/gallon, as applied;
 - d. the number of gallons of each coating employed minus the number of gallons of each coating recovered for disposal;
 - e. the total VOC emissions from all the coatings employed, in lbs/day, i.e., sum of (c) times (d);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly VOC emission rate for all the coatings, i.e., (e)/(f), in lbs/hr.

[Note: The coating information must be for the coatings as employed, including any

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thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the number of gallons of cleanup material employed minus the number of gallons of cleanup material recovered for disposal;
 - b. the VOC content of each cleanup material, in lbs/gallon;
 - c. the total VOC emissions from all cleanup materials employed, in lbs/month, i.e., sum of (b) times (a); and
 - d. the actual VOC emissions from all the coatings and cleanup materials employed, in tons, i.e., [(the summation of the daily VOC emissions, from section C.2.e, for the calendar month + the monthly cleanup material VOC emissions from section C.3.c) divided by 2000 lbs/ton].
4. The permittee shall calculate and record the following VOC information for each month for emissions units R004 through R010, combined:
 - a. the total VOC emissions for all the coatings and cleanup materials employed, in tons (calculated by summing the total VOC emissions recorded in section C.4.d for each emissions unit); and
 - b. the total VOC emissions for the previous, 12-month period, in tons.
5. The permittee shall calculate and record the following HAP information for each month for emissions units R004 through R010, combined:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the single HAP (see notes below) content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon of coating, as applied;
 - d. the total single HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month, i.e., for each HAP the sum of (b) times

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- (c) for each coating and cleanup material, divided by 2000;
- e. the rolling, 12-month summation of the emissions of each single HAP for the previous 12-month period, i.e., the summation of (d) in tons per rolling, 12-month period;
 - f. the total, combined HAPs (see notes below) content for all HAPs of each coating and cleanup material, in pounds of total, combined HAPs per gallon of coating, as applied;
 - g. the total, combined HAPs emissions from all coatings and cleanup materials employed, in tons per month, i.e., the sum of (b) times (f) for each coating and cleanup material, divided by 2000; and
 - h. the rolling, 12-month summation of the emissions of total, combined HAPs for the previous 12-month period, i.e., the summation of (g) in tons per rolling, 12-month period.

[Note 1: A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.]

[Note 2: Any determination of the HAP content of any coating or cleanup material shall be based on the coating or cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings or cleanup materials by formulation data supplied by the manufacturer of the coatings or cleanup materials, or from data determined by an analysis of each coating or cleanup material, as applied.]

- 6. The permit to install for this emissions unit [R007] and emissions units R004, R005, R006, R007, R008, R009 and R010, combined, 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 SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level

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Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for emissions units R004, R005, R006, R007, R008, R009 and R010, combined:

Pollutant: n-butyl alcohol

TLV (mg/m³): 60.6

Maximum Hourly Emission Rate (lbs/hr): 22.7

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 451.7

MAGLC (ug/m³): 14,428

7. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be 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' (ACGIH'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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above

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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.

8. 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.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Northeast District Office in writing of any daily record showing that 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 Ohio EPA, Northeast District Office within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. each day during which the average VOC emissions from the coatings exceeded the pounds per hour limitation, and the actual average VOC emissions for each such day;
 - b. each day during which the VOC content of any coating exceeded the pounds per gallon limitation, and the actual VOC content of each such coating employed;
 - c. all exceedances of the rolling, 12-month VOC emission limitation for this emissions unit and emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual VOC emissions during each such period;

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- d. any exceedence of the rolling, 12-month emission limitation for each single HAP from emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual single HAP emissions during each such period; and
- e. any exceedence of the rolling, 12-month emission limitation for total, combined HAPs from emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual total, combined HAPs emissions during each such period.

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

- 3. The permittee shall also submit annual reports that summarize the actual annual emissions of VOC, from this emissions unit and the maximum single HAP emissions and total, combined HAP emissions from emissions units R004, R005, R006, R007, R008, R009 and R010, combined. The reports shall include the emissions calculations and shall be submitted by January 31 of each year, and shall cover the previous calendar year.

E. Testing Requirements

- 1. Compliance with the allowable emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

18.30 pounds VOC emissions per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be determined based upon the record keeping requirements specified in section C.2 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 1 through 4 and Method 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

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80.29 tons per year of VOC emissions from this emissions unit and 97.5 tons of VOC emissions per rolling, 12-month period from all the coatings and cleanup materials, for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in sections C.2, C.3 and C.4 of this permit.

c. Emission Limitation:

6.10 pounds of VOC per gallon coating, as applied

Applicable Compliance Method:

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.

d. Emission Limitation:

9.5 tons of each single HAP, based upon a rolling, 12-month summation for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements

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specified in section C.5.e.

e. Emission Limitation:

24.5 tons of each total, combined HAPs, based upon a rolling, 12-month summation for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in section C.5.h.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.6, C.7 and C.8.
2. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emissions unit contained in permit to install 02-11354 as issued on March 11, 1998.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R008) - sealer coat spray booth, one manual spray gun/pump, associated drying oven and conveyor system to finish wood furniture

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.b, A.2.c and B.1 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
OAC rule 3745-21-07(G)(2)	See section A.2.a below.
OAC rule 3745-31-05(C)	See sections A.2.d, A.2.e and B.2 below.

2. Additional Terms and Conditions

- 2.a No photochemically reactive materials (coatings and cleanup materials), as defined in OAC rule 3745-21-01(C)(5), shall be employed in this emissions unit.
- 2.b The volatile organic compound (VOC) emissions from all the coatings shall not exceed 18.30 pounds per hour. [This limit is based upon the maximum application rate of 3.0 gallons per hour.]
- 2.c The VOC content of each coating shall not exceed 6.10 pounds per gallon, as applied.
- 2.d The hazardous air pollutant (HAP) emissions from all the coatings and cleanup materials for emissions units R004, R005, R006, R007, R008, R009 and R010, combined, shall not exceed 9.5 tons of any single HAP per rolling, 12-month period, or 24.5 tons of total, combined HAPs per rolling, 12-month period.
- 2.e The VOC emissions from all the coatings and cleanup materials shall not exceed 80.29 tons per year from this emissions unit, and shall not exceed 97.5 tons per rolling, 12-month period for emissions units R004, R005, R006, R007, R008,

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R009 and R010, combined.

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
2. The maximum emissions from the coatings and cleanup materials usage for emissions units R004, R005, R006, R007, R008, R009 and R010, combined, shall not exceed 97.5 tons of VOC, 9.5 tons of a single HAP or 24.5 tons of total, combined HAPs per rolling, 12-month period. The permittee has existing coating and clean up material usage records such that there is no need for first year monthly VOC emission limitations.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each day for the emissions unit:
 - a. the company identification for each coating or cleanup material employed;
 - b. documentation on whether or not each material employed (coating and cleanup) was a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. the VOC content of each coating, in lbs/gallon, as applied;
 - d. the number of gallons of each coating employed minus the number of gallons of each coating recovered for disposal;
 - e. the total VOC emissions from all the coatings employed, in lbs/day, i.e., sum of (c) times (d);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly VOC emission rate for all the coatings, i.e., (e)/(f), in lbs/hr.

[Note: The coating information must be for the coatings as employed, including any

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thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the number of gallons of cleanup material employed minus the number of gallons of cleanup material recovered for disposal;
 - b. the VOC content of each cleanup material, in lbs/gallon;
 - c. the total VOC emissions from all cleanup materials employed, in lbs/month, i.e., sum of (b) times (a); and
 - d. the actual VOC emissions from all the coatings and cleanup materials employed, in tons, i.e., [(the summation of the daily VOC emissions, from section C.2.e, for the calendar month + the monthly cleanup material VOC emissions from section C.3.c) divided by 2000 lbs/ton].
4. The permittee shall calculate and record the following VOC information for each month for emissions units R004 through R010, combined:
 - a. the total VOC emissions for all the coatings and cleanup materials employed, in tons (calculated by summing the total VOC emissions recorded in section C.4.d for each emissions unit); and
 - b. the total VOC emissions for the previous, 12-month period, in tons.
5. The permittee shall calculate and record the following HAP information for each month for emissions units R004 through R010, combined:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the single HAP (see notes below) content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon of coating, as applied;
 - d. the total single HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month, i.e., for each HAP the sum of (b) times

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- (c) for each coating and cleanup material, divided by 2000;
- e. the rolling, 12-month summation of the emissions of each single HAP for the previous 12-month period, i.e., the summation of (d) in tons per rolling, 12-month period;
 - f. the total, combined HAPs (see notes below) content for all HAPs of each coating and cleanup material, in pounds of total, combined HAPs per gallon of coating, as applied;
 - g. the total, combined HAPs emissions from all coatings and cleanup materials employed, in tons per month, i.e., the sum of (b) times (f) for each coating and cleanup material, divided by 2000; and
 - h. the rolling, 12-month summation of the emissions of total, combined HAPs for the previous 12-month period, i.e., the summation of (g) in tons per rolling, 12-month period.

[Note 1: A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.]

[Note 2: Any determination of the HAP content of any coating or cleanup material shall be based on the coating or cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings or cleanup materials by formulation data supplied by the manufacturer of the coatings or cleanup materials, or from data determined by an analysis of each coating or cleanup material, as applied.]

- 6. The permit to install for this emissions unit [R008] and emissions units R004, R005, R006, R007, R008, R009 and R010, combined, 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 SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level

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Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for emissions units R004, R005, R006, R007, R008, R009 and R010, combined:

Pollutant: n-butyl alcohol

TLV (mg/m³): 60.6

Maximum Hourly Emission Rate (lbs/hr): 22.7

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 451.7

MAGLC (ug/m³): 14,428

7. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be 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' (ACGIH'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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above

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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.

8. 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.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Northeast District Office in writing of any daily record showing that 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 Ohio EPA, Northeast District Office within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. each day during which the average VOC emissions from the coatings exceeded the pounds per hour limitation, and the actual average VOC emissions for each such day;
 - b. each day during which the VOC content of any coating exceeded the pounds per gallon limitation, and the actual VOC content of each such coating employed;
 - c. all exceedances of the rolling, 12-month VOC emission limitation for this emissions unit and emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual VOC emissions during each such period;

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- d. any exceedence of the rolling, 12-month emission limitation for each single HAP from emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual single HAP emissions during each such period; and
- e. any exceedence of the rolling, 12-month emission limitation for total, combined HAPs from emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual total, combined HAPs emissions during each such period.

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

- 3. The permittee shall also submit annual reports that summarize the actual annual emissions of VOC, from this emissions unit and the maximum single HAP emissions and total, combined HAP emissions from emissions units R004, R005, R006, R007, R008, R009 and R010, combined. The reports shall include the emissions calculations and shall be submitted by January 31 of each year, and shall cover the previous calendar year.

E. Testing Requirements

- 1. Compliance with the allowable emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

18.30 pounds VOC emissions per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be determined based upon the record keeping requirements specified in section C.2 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 1 through 4 and Method 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

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80.29 tons per year of VOC emissions from this emissions unit and 97.5 tons of VOC emissions per rolling, 12-month period from all the coatings and cleanup materials, for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in sections C.2, C.3 and C.4 of this permit.

c. Emission Limitation:

6.10 pounds of VOC per gallon coating, as applied

Applicable Compliance Method:

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.

d. Emission Limitation:

9.5 tons of each single HAP, based upon a rolling, 12-month summation for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements

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specified in section C.5.e.

e. Emission Limitation:

24.5 tons of each total, combined HAPs, based upon a rolling, 12-month summation for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in section C.5.h.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.6, C.7 and C.8.
2. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emissions unit contained in permit to install 02-11354 as issued on March 11, 1998.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R009) - stain spray booth 1, one manual spray gun/pump and manual wiping, associated drying oven and conveyor system to finish wood furniture

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.b, A.2.c and B.1 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
OAC rule 3745-21-07(G)(2)	See section A.2.a below.
OAC rule 3745-31-05(C)	See sections A.2.d, A.2.e and B.2 below.

2. Additional Terms and Conditions

- 2.a No photochemically reactive materials (coatings and cleanup materials), as defined in OAC rule 3745-21-01(C)(5), shall be employed in this emissions unit.
- 2.b The volatile organic compound (VOC) emissions from all the coatings shall not exceed 20.97 pounds per hour. [This limit is based upon the maximum application rate of 3.0 gallons per hour.]
- 2.c The VOC content of each coating shall not exceed 6.99 pounds per gallon, as applied.
- 2.d The hazardous air pollutant (HAP) emissions from all the coatings and cleanup materials for emissions units R004, R005, R006, R007, R008, R009 and R010, combined, shall not exceed 9.5 tons of any single HAP per rolling, 12-month period, or 24.5 tons of total, combined HAPs per rolling, 12-month period.
- 2.e The VOC emissions from all the coatings and cleanup materials shall not exceed 91.99 tons per year from this emissions unit, and shall not exceed 97.5 tons per

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rolling, 12-month period for emissions units R004, R005, R006, R007, R008, R009 and R010, combined.

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
2. The maximum emissions from the coatings and cleanup materials usage for emissions units R004, R005, R006, R007, R008, R009 and R010, combined, shall not exceed 97.5 tons of VOC, 9.5 tons of a single HAP or 24.5 tons of total, combined HAPs per rolling, 12-month period. The permittee has existing coating and clean up material usage records such that there is no need for first year monthly VOC emission limitations.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each day for the emissions unit:
 - a. the company identification for each coating or cleanup material employed;
 - b. documentation on whether or not each material employed (coating and cleanup) was a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. the VOC content of each coating, in lbs/gallon, as applied;
 - d. the number of gallons of each coating employed minus the number of gallons of each coating recovered for disposal;
 - e. the total VOC emissions from all the coatings employed, in lbs/day, i.e., sum of (c) times (d);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly VOC emission rate for all the coatings, i.e., (e)/(f), in lbs/hr.

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[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).]

3. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the number of gallons of cleanup material employed minus the number of gallons of cleanup material recovered for disposal;
 - b. the VOC content of each cleanup material, in lbs/gallon;
 - c. the total VOC emissions from all cleanup materials employed, in lbs/month, i.e., sum of (b) times (a); and
 - d. the actual VOC emissions from all the coatings and cleanup materials employed, in tons, i.e., [(the summation of the daily VOC emissions, from section C.2.e, for the calendar month + the monthly cleanup material VOC emissions from section C.3.c) divided by 2000 lbs/ton].
4. The permittee shall calculate and record the following VOC information for each month for emissions units R004 through R010, combined:
 - a. the total VOC emissions for all the coatings and cleanup materials employed, in tons (calculated by summing the total VOC emissions recorded in section C.4.d for each emissions unit); and
 - b. the total VOC emissions for the previous, 12-month period, in tons.
5. The permittee shall calculate and record the following HAP information for each month for emissions units R004 through R010, combined:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the single HAP (see notes below) content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon of coating, as applied;
 - d. the total single HAP emissions for each HAP from all coatings and cleanup

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materials employed, in tons per month, i.e., for each HAP the sum of (b) times (c) for each coating and cleanup material, divided by 2000;

- e. the rolling, 12-month summation of the emissions of each single HAP for the previous 12-month period, i.e., the summation of (d) in tons per rolling, 12-month period;
- f. the total, combined HAPs (see notes below) content for all HAPs of each coating and cleanup material, in pounds of total, combined HAPs per gallon of coating, as applied;
- g. the total, combined HAPs emissions from all coatings and cleanup materials employed, in tons per month, i.e., the sum of (b) times (f) for each coating and cleanup material, divided by 2000; and
- h. the rolling, 12-month summation of the emissions of total, combined HAPs for the previous 12-month period, i.e., the summation of (g) in tons per rolling, 12-month period.

[Note 1: A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.]

[Note 2: Any determination of the HAP content of any coating or cleanup material shall be based on the coating or cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings or cleanup materials by formulation data supplied by the manufacturer of the coatings or cleanup materials, or from data determined by an analysis of each coating or cleanup material, as applied.]

- 6. The permit to install for this emissions unit [R009] and emissions units R004, R005, R006, R007, R008, R009 and R010, combined, 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 SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0

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(or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for emissions units R004, R005, R006, R007, R008, R009 and R010, combined:

Pollutant: n-butyl alcohol

TLV (mg/m³): 60.6

Maximum Hourly Emission Rate (lbs/hr): 22.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 451.7

MAGLC (ug/m³): 14,428

7. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be 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' (ACGIH'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.).

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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.

8. 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.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Northeast District Office in writing of any daily record showing that 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 Ohio EPA, Northeast District Office within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. each day during which the average VOC emissions from the coatings exceeded the pounds per hour limitation, and the actual average VOC emissions for each such day;
 - b. each day during which the VOC content of any coating exceeded the pounds per gallon limitation, and the actual VOC content of each such coating employed;
 - c. all exceedances of the rolling, 12-month VOC emission limitation for this emissions unit and emissions units R004, R005, R006, R007, R008, R009 and

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R010, combined, and the actual VOC emissions during each such period;

- d. any exceedence of the rolling, 12-month emission limitation for each single HAP from emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual single HAP emissions during each such period; and
- e. any exceedence of the rolling, 12-month emissions limitation for total, combined HAPs from emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual total, combined HAPs emissions during each such period.

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

- 3. The permittee shall also submit annual reports that summarize the actual annual emissions of VOC, from this emissions unit and the maximum single HAP emissions and total, combined HAP emissions from emissions units R004, R005, R006, R007, R008, R009 and R010, combined. The reports shall include the emissions calculations and shall be submitted by January 31 of each year, and shall cover the previous calendar year.

E. Testing Requirements

- 1. Compliance with the allowable emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

20.97 pounds VOC emissions per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be determined based upon the record keeping requirements specified in section C.2 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 1 through 4 and Method 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

Emissions Unit ID: **R009****b. Emission Limitations:**

91.99 tons per year of VOC emissions from this emissions unit and 97.5 tons of VOC emissions per rolling, 12-month period from all the coatings and cleanup materials, for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in sections C.2, C.3 and C.4 of this permit.

c. Emission Limitation:

6.99 pounds of VOC per gallon coating, as applied

Applicable Compliance Method:

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.

d. Emission Limitation:

9.5 tons of each single HAP, based upon a rolling, 12-month summation for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

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Compliance shall be demonstrated based on the record keeping requirements specified in section C.5.e.

e. Emission Limitation:

24.5 tons of each total, combined HAPs, based upon a rolling, 12-month summation for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in section C.5.h.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.6, C.7 and C.8.
2. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emissions unit contained in permit to install 02-11354 as issued on March 11, 1998.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (R010) - off line manual spray booth to finish wood furniture

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.b, A.2.c and B.1 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2).
OAC rule 3745-21-07(G)(2)	See section A.2.a below.
OAC rule 3745-31-05(C)	See sections A.2.d, A.2.e and B.2 below.

2. Additional Terms and Conditions

- 2.a No photochemically reactive materials (coatings and cleanup materials), as defined in OAC rule 3745-21-01(C)(5), shall be employed in this emissions unit.
- 2.b The volatile organic compound (VOC) emissions from all the coatings shall not exceed 18.30 pounds per hour. [This limit is based upon the maximum application rate of 3.0 gallons per hour.]
- 2.c The VOC content of each coating shall not exceed 6.10 pounds per gallon, as applied.
- 2.d The hazardous air pollutant (HAP) emissions from all the coatings and cleanup materials for emissions units R004, R005, R006, R007, R008, R009 and R010, combined, shall not exceed 9.5 tons of any single HAP per rolling, 12-month period, or 24.5 tons of total, combined HAPs per rolling, 12-month period.
- 2.e The VOC emissions from all the coatings and cleanup materials shall not exceed 80.29 tons per year from this emissions unit, and shall not exceed 97.5 tons per rolling, 12-month period for emissions units R004, R005, R006, R007, R008,

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R009 and R010, combined.

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
2. The maximum emissions from the coatings and cleanup materials usage for emissions units R004, R005, R006, R007, R008, R009 and R010, combined, shall not exceed 97.5 tons of VOC, 9.5 tons of a single HAP or 24.5 tons of total, combined HAPs per rolling, 12-month period. The permittee has existing coating and clean up material usage records such that there is no need for first year monthly VOC emission limitations.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each day for the emissions unit:
 - a. the company identification for each coating or cleanup material employed;
 - b. documentation on whether or not each material employed (coating and cleanup) was a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. the VOC content of each coating, in lbs/gallon, as applied;
 - d. the number of gallons of each coating employed minus the number of gallons of each coating recovered for disposal;
 - e. the total VOC emissions from all the coatings employed, in lbs/day, i.e., sum of (c) times (d);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly VOC emission rate for all the coatings, i.e., (e)/(f), in lbs/hr.

[Note: The coating information must be for the coatings as employed, including any

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thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the number of gallons of cleanup material employed minus the number of gallons of cleanup material recovered for disposal;
 - b. the VOC content of each cleanup material, in lbs/gallon;
 - c. the total VOC emissions from all cleanup materials employed, in lbs/month, i.e., sum of (b) times (a); and
 - d. the actual VOC emissions from all the coatings and cleanup materials employed, in tons, i.e., [(the summation of the daily VOC emissions, from section C.2.e, for the calendar month + the monthly cleanup material VOC emissions from section C.3.c) divided by 2000 lbs/ton].
4. The permittee shall calculate and record the following VOC information for each month for emissions units R004 through R010, combined:
 - a. the total VOC emissions for all the coatings and cleanup materials employed, in tons (calculated by summing the total VOC emissions recorded in section C.4.d for each emissions unit); and
 - b. the total VOC emissions for the previous, 12-month period, in tons.
5. The permittee shall calculate and record the following HAP information for each month for emissions units R004 through R010, combined:
 - a. the name and identification number of each coating and cleanup material, as applied;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the single HAP (see notes below) content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon of coating, as applied;
 - d. the total single HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month, i.e., for each HAP the sum of (b) times

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- (c) for each coating and cleanup material, divided by 2000;
- e. the rolling, 12-month summation of the emissions of each single HAP for the previous 12-month period, i.e., the summation of (d) in tons per rolling, 12-month period;
 - f. the total, combined HAPs (see notes below) content for all HAPs of each coating and cleanup material, in pounds of total, combined HAPs per gallon of coating, as applied;
 - g. the total, combined HAPs emissions from all coatings and cleanup materials employed, in tons per month, i.e., the sum of (b) times (f) for each coating and cleanup material, divided by 2000; and
 - h. the rolling, 12-month summation of the emissions of total, combined HAPs for the previous 12-month period, i.e., the summation of (g) in tons per rolling, 12-month period.

[Note 1: A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.]

[Note 2: Any determination of the HAP content of any coating or cleanup material shall be based on the coating or cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings or cleanup materials by formulation data supplied by the manufacturer of the coatings or cleanup materials, or from data determined by an analysis of each coating or cleanup material, as applied.]

- 6. The permit to install for this emissions unit [R010] and emissions units R004, R005, R006, R007, R008, R009 and R010, combined, 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 SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level

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Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for emissions units R004, R005, R006, R007, R008, R009 and R010, combined:

Pollutant: n-butyl alcohol

TLV (mg/m³): 60.6

Maximum Hourly Emission Rate (lbs/hr): 22.7

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 451.7

MAGLC (ug/m³): 14,428

7. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be 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' (ACGIH'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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above

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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.

8. 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.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Northeast District Office in writing of any daily record showing that 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 Ohio EPA, Northeast District Office within 30 days after the event occurs.
2. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. each day during which the average VOC emissions from the coatings exceeded the pounds per hour limitation, and the actual average VOC emissions for each such day;
 - b. each day during which the VOC content of any coating exceeded the pounds per gallon limitation, and the actual VOC content of each such coating employed;
 - c. all exceedances of the rolling, 12-month VOC emission limitation for this emissions unit and emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual VOC emissions during each such period;

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- d. any exceedence of the rolling, 12-month emissions limitation for each single HAP from emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual single HAP emissions during each such period; and
- e. any exceedence of the rolling, 12-month emissions limitation for total, combined HAPs from emissions units R004, R005, R006, R007, R008, R009 and R010, combined, and the actual total, combined HAPs emissions during each such period.

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

- 3. The permittee shall also submit annual reports that summarize the actual annual emissions of VOC, from this emissions unit and the maximum single HAP emissions and total, combined HAP emissions from emissions units R004, R005, R006, R007, R008, R009 and R010, combined. The reports shall include the emissions calculations and shall be submitted by January 31 of each year, and shall cover the previous calendar year.

E. Testing Requirements

- 1. Compliance with the allowable emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

18.30 pounds VOC emissions per hour

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be determined based upon the record keeping requirements specified in section C.2 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 1 through 4 and Method 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

- b. Emission Limitations:

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80.29 tons per year of VOC emissions from this emissions unit and 97.5 tons of VOC emissions per rolling, 12-month period from all the coatings and cleanup materials, for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in sections C.2, C.3 and C.4 of this permit.

c. Emission Limitation:

6.10 pounds of VOC per gallon coating, as applied

Applicable Compliance Method:

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.

d. Emission Limitation:

9.5 tons of each single HAP, based upon a rolling, 12-month summation for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements

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specified in section C.5.e.

e. Emission Limitation:

24.5 tons of each total, combined HAPs, based upon a rolling, 12-month summation for emissions units R004, R005, R006, R007, R008, R009 and R010, combined

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in section C.5.h.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.6, C.7 and C.8.