☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**
Permit To Install: **02-22188**

A. Source Description:

Mt. Hope Finishing is a manufacturer and finisher of wood furniture. (SIC 2511) The facility installed and commenced operation in October, 2003.

B. Facility Emissions and Attainment Status

The facility is located in Holmes County, which is attainment for all criteria pollutants. The facility will emit VOC and HAPs from 3 furniture finishing spray coating operations. The facility-wide Potentials to Emit exceed the thresholds for Title V. PTEs are 219.4 tons of VOC emissions.

C. Source Emissions

R001 Booth #1 Wood furniture staining operation, consisting of one booth with overspray filters, and one HVLP spray gun/pump. Parts are manually moved and air dried. Installed in October 2003 without first applying and receiving a PTI. EU uses no PRMs currently. Duel limits were given for days using PRM and days using only non-PRM. Potential VOC emissions are 63.26 tons per year.

R002 Booth #2 Wood furniture sealing operation, consisting of one booth with overspray filters, and one airless spray gun/pump. Parts are manually moved and air dried. Installed in October 2003 without first applying and receiving a PTI. EU used no PRMs currently. Duel limits were given for days using PRM and days using only non-PRM. Potential VOC emissions are 77.14 tons per year.

R003 Booth #3 Wood furniture sealing and topcoating operation, consisting of one booth with overspray filters, and one airless spray gun/pump. Parts are manually moved and air dried. Installed in October 2003 without first applying and receiving a PTI. EU used no PRMs currently. Duel limits were given for days using PRM and days using only non-PRM. Potential VOC emissions are 77.14 tons per year.

P001 180 HP John Deere diesel engine derated to 173 HP at 2000 rpm . Unit installed October 2003. Potential VOC emissions are 1.9 tons per year.

The allowable emissions including the federally enforceable limits in this PTI is 25.0 tons per year from R001, R002 and R003, combined and 1.9 tons per year from P001.

D. Conclusion

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

State of Ohio Environmental Protection Agency

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

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 02-22188
Fac ID: 0238000199

DATE: 10/19/2006

Mt. Hope Finishing
Joseph Miller
8175 State Route 241
Millersburg, OH 44654

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 of 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 **$1600** 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**

HOLMES COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **02-22188** FOR AN AIR CONTAMINANT SOURCE FOR
Mt. Hope Finishing

On 10/19/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Mt. Hope Finishing**, located at **8175 State Route 241, Millersburg**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-22188:

3 paint spray booths, 1 diesel engine.

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]

DRAFT PERMIT TO INSTALL 02-22188

Application Number:	02-22188
Facility ID:	0238000199
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Mt. Hope Finishing
Person to Contact:	Joseph Miller
Address:	8175 State Route 241 Millersburg, OH 44654

Location of proposed air contaminant source(s) [emissions unit(s)]:
8175 State Route 241
Millersburg, Ohio

Description of proposed emissions unit(s):
3 paint spray booths, 1 diesel engine.

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

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install 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 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 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 quarterly, i.e., 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of 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.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) 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.

15. 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 this Permit to Install.

B. 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

Pollutant	Tons Per Year
VOC	26.9
NOx	12.12
SO2	2.41
PE	1.64

Emissions Unit ID: **P001**

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 - (P001) - 185 HP John Deere diesel engine derated to 173 HP at 2000 rpm intermittent

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	0.38 lb/hr and 1.64 tpy of particulate emissions (PE)/PM less than 10 microns in diameter (PM-10). 0.55 lb/hr and 2.41 tpy of sulfur dioxide (SO2). Also includes B.1 below. 2.77 lbs/hr and 12.12 tpy of nitrogen dioxides (NOx). 0.43 lb/hr and 1.90 tpy of organic compounds (OC). Visible particulate emissions from the stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average. See sections A.2.b and B.2 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(5)(a).
OAC rule 3745-17-11(B)(5)(a)	Particulate emissions shall not exceed 0.25 lb/mmBtu actual heat input. See section A.2.c below.
OAC rule 3745-17-11(B)(5)(a)	Particulate emissions shall not exceed 0.310 lb/mmBtu actual heat input. See section A.2.d below.

OAC rule 3745-17-07(A)(1)	The visible particulate emission limitation required by this applicable rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-18-06(G)	This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).

2. Additional Terms and Conditions

2.a In accordance with OAC rule 3745-31-05(A)(3), best available technology for this emissions unit includes the emission limitations and fuel sulfur content restriction.

2.b The total power output for P001 is derated from 185 horsepower to 173 horsepower. The derated total output of 173 horsepower corresponds to 2000 revolutions per minute intermittent power and is limited by the associated hydraulic pumps.

2.c The requirement to comply with this particulate emission limitation shall terminate on the date the U.S. EPA approves the 0.310 lb/mmBtu actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.

2.d This particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.

B. Operational Restrictions

1. The permittee shall use only diesel fuel/number 2 fuel oil with a maximum sulfur content of 0.5 percent by weight for combustion in this emissions unit.

2. At no time shall P001 exceed 173 horsepower or the drive capacity exceed 2000 rpm.

C. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

2. The permittee shall maintain documentation of the sulfur content of all fuels received.

3. The permittee shall document any change in the operation of the associated equipment that enables the output of emissions unit P001 to exceed 173 horsepower or the drive capacity exceed 2000 rpm.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day during which a fuel other than diesel fuel with a maximum sulfur content of 0.5 percent, by weight, was burned in this emissions unit. Each report shall be submitted within 30 days of the deviation.

2. The permittee shall submit deviation (excursion) reports that identify any change in the operation of the associated equipment that allows P001 to exceed 173 horsepower or the drive capacity exceed 2000 rpm. Each report shall be submitted within 30 days of the deviation.

3. The reports shall include what corrective action was taken and shall be sent to the Director (Ohio EPA Northeast District Office) within 30 days following the exceedance.

E. Testing Requirements

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

   a. Emission Limitation:

      0.38 lb/hr of PM/PM-10

      Applicable Compliance Method:

      Compliance with the hourly emission limitation is based upon compliance with the emission limitation specified in OAC rule 3745-17-11(B)(5)(a).

      If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

   b. Emission Limitation:

      1.64 tpy of PM/PM-10

      Applicable Compliance Method:

      The tpy emission limitation was developed by multiplying the short-term allowable particulate emission limitation (0.38 lb/hr) by the maximum annual

hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

c. Emission Limitation:

0.55 lb/hr of SO2

Applicable Compliance Method:

Compliance with the hourly emission limitation above shall be determined by the following equation:

(0.351 lb fuel/hp-hr) (173 hp) (S) (64 SO_2/32 S) (0.9 conversion)

where:

0.351 lb fuel/hp-hr is the manufacturer supplied fuel consumption;
173 hp is the de-rated horsepower;
S is the percent sulfur in the fuel, 0.5%
64 is the molecular mass of sulfur dioxide;
32 is the molecular mass of sulfur; and
0.9 is 90% conversion of sulfur to sulfur dioxide.

d. Emission Limitation:

2.41 tpy of SO2

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable SO2 emission limitation (0.55 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

e. Emission Limitation:

2.77 lbs/hr of NOx

Applicable Compliance Method:

Compliance with the hourly emission limitation above shall be determined by multiplying 0.016 lb/hp-hr, the emission factor provided by the manufacturer, by 173 hp, the power output rating of this emissions unit.

f. Emission Limitation:

12.12 tpy of NOx

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable NOx emission limitation (2.77 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

0.43 lb/hr of OC

Applicable Compliance Method:

Compliance with the hourly emission limitation above shall be determined by multiplying 0.00251 lb/hp-hr, the emission factor from AP-42, table 3.3-1 (10/96), by 173 hp, the power output rating of this emissions unit.

h. Emission Limitation:

1.90 tpy of OC

Applicable Compliance Method:

The tpy emission limitation was developed by multiplying the short-term allowable OC emission limitation (0.43 lb/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 lbs per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

i. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 10% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the method and procedures specified in 40 CFR, Part 60, Appendix A, Method 9.

j. Emission Limitation:

Particulate emissions shall not exceed 0.310 lb/mmBtu actual heat input.

Applicable Compliance Method:

Compliance shall be based upon an emission factor of 0.31 lb/mmBtu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

k. Emission Limitation:

Particulate emissions shall not exceed 0.25 lb/mmBtu actual heat input.

Applicable Compliance Method:

The permittee cannot demonstrate compliance with this emission limitation based upon the current emission factor contained in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96). The Ohio EPA revised the emission limitation specified in this rule citation based upon the currently applicable emission factor. The revised rule was adopted by the Director of Ohio EPA in December of 1997, and it will be submitted to the U.S. EPA as a proposed revision to the Ohio SIP for particulate matter. When the SIP revision is approved by the U.S. EPA, the 0.25 lb/mmBtu actual heat input emission limitation will no longer be applicable, and the permittee will be able to demonstrate compliance with the new emission limitation (0.310 lb/mmBtu actual heat input) using the current emission factor.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

F. Miscellaneous Requirements

None

Issued: To be entered upon final issuance
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 - (R001) - Manual spray coating operation to finish wood furniture consisting of one coating booth with dry overspray filters, one HVLP spray gun/pump. Parts are manually moved and air dried.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.b, A.2.c, B.1, B.3 and B.4 below. The requirements of this rule also include compliance with 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 and B.2 below.

2. Additional Terms and Conditions

2.a On any day during which any photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all the coatings and photochemically reactive cleanup materials shall not exceed 8 pounds per hour and 40 pounds per day. [OC emissions from any cleanup material that is not a photochemically reactive material shall not be counted towards the 8 lbs/hr and 40 lbs/day limitations.]

2.b On any day during which no photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are employed, the volatile organic compounds (VOC) emissions from all the coatings shall not exceed 14.34 pounds per hour. [This emission limitation is based upon the maximum application rate of 2.2 gallons per hour.]

2.c The VOC content of each coating shall not exceed 6.52 pounds per gallon, as applied.

2.d The VOC emissions from all the coatings and cleanup materials for emissions

Emissions Unit ID: **R001**

units R001, R002, and R003, combined, shall not exceed 25.0 tons per rolling, 12-month period.

Issued: To be entered upon final issuance

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 R001, R002, and R003, combined, shall not exceed 25.0 tons of VOC per rolling, 12-month period. The permittee has existing production records such that there is no need for first year monthly usage limitations.

3. The hours of operation of this emissions unit shall not exceed 93 hours per week.

4. The n-butyl acetate content of the coatings shall not exceed 4.12 pounds per gallon, as applied.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that document all time periods during which 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 during which any photochemically reactive material is employed in this emissions unit:

   a. the company identification for each coating and photochemically reactive cleanup material employed;

   b. the number of gallons of each coating and photochemically reactive cleanup material employed minus the number of gallons of each coating and photochemically reactive cleanup material recovered for disposal;

   c. the OC content of each coating and photochemically reactive cleanup material, in pounds OC per gallon;

   d. the total emissions rate for all the coatings and photochemically reactive cleanup materials, in pounds OC per day;

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

   f. the average hourly OC emission rate for all the coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);

g. the VOC content of each coating and photochemically reactive cleanup material, in pounds VOC per gallon; and

h. the total emissions rate for all coatings and photochemically reactive cleanup materials, in pounds VOC per day.

[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 day during which no photochemically reactive materials are employed in this 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.

4. The permittee shall maintain records of the n-butyl acetate content of each coating and cleanup material, as applied, in pounds per gallon.

5. The permittee shall record the total number of hours the emissions unit was in operation during each week; i.e., sum of (C.2.e plus C.3.f).

6. The permittee shall collect and record the following information for each month for the emissions unit:

   a. the number of gallons of each nonphotochemically reactive cleanup material

employed minus the number of gallons of cleanup material recovered for disposal;

b. the volatile organic compound (VOC) content of each nonphotochemically cleanup material, in lbs/gallon;

c. the total VOC emissions from all nonphotochemically reactive 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.h, for the calendar month + the summation of the daily VOC emissions, from section C.3.e, for the calendar month + the monthly nonphotochemically reactive cleanup material VOC emissions from section C.6.c), divided by 2000 lbs/ton].

7. The permittee shall calculate and record the following information for each month for emissions units R001 through R003, combined:

a. the total VOC emissions for all the coatings and cleanup materials employed, in tons (calculated by summing the VOC emissions for R001, R002, and R003; and

b. the rolling, 12-month VOC emissions, in tons.

8. The permit to install for this emissions unit [R001] and emissions units R001, R002, and R003, combined, were 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 units R001, R002, and R003, combined:

Compound: n-butyl acetate

TLV (mg/m3): 712.6

Emissions Unit ID: **R001**

Maximum Hourly Emission Rate (lbs/hr): 34.84

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 30,217

Adjusted MAGLC (ug/m3): 30,651

9. 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 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.

10. 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 Director 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 Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

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

    a. for the days during which any photochemically reactive material was employed, each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such day;

    b. for the days during which no photochemically reactive materials were employed, 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;

    c. 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;

    d. all exceedances of the rolling, 12-month VOC emission limitation, and the actual VOC emissions during such period;

    e. any exceedence of the weekly hours of operation limitation, and the actual hours

operated; and

f. any exceedance of the n-butyl acetate content limitation for any coating, as applied, and the actual n-butyl acetate content of each such coating.

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 from emissions units R001, R002, and R003, combined. The reports shall include the emission 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:

8 pounds per hour of OC emissions for each day during which any photochemically reactive material is employed

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may 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 OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

40 pounds per day of OC emissions for each day during which any photochemically reactive material is employed

Applicable Compliance Method:

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

c. Emission Limitation:

14.34 pounds per hour of VOC emissions for each day during which no photochemically reactive materials are employed

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined based upon the record keeping requirements specified in section C.3 of this permit.

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

d. Emission Limitation:

25.0 tons of VOC emissions per rolling, 12-month period from all the coatings and cleanup materials (for emissions units R001, R002, and R003, 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, C.6 and C.7 of this permit.

e. Emission Limitation:

6.52 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.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(D), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.8, C.9, and C.10.

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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 - (R002) - Manual spray coating operation to finish wood furniture consisting of one coating booth with dry overspray filters, one air-assisted spray gun/pump. Parts are manually moved and air dried.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.b, A.2.c, B.1, B.3 and B.4 below. The requirements of this rule also include compliance with 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 and B.2 below.

2. Additional Terms and Conditions

2.a On any day during which any photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all the coatings and photochemically reactive cleanup materials shall not exceed 8 pounds per hour and 40 pounds per day. [OC emissions from any cleanup material that is not a photochemically reactive material shall not be counted towards the 8 lbs/hr and 40 lbs/day limitations.]

2.b On any day during which no photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are employed, the volatile organic compounds (VOC) emissions from all the coatings shall not exceed 17.26 pounds per hour. [This emission limitation is based upon the maximum application rate of 3.3 gallons per hour.]

2.c The VOC content of each coating shall not exceed 5.32 pounds per gallon, as applied.

2.d The VOC emissions from all the coatings and cleanup materials for emissions

Issued: To be entered upon final issuance

units R001, R002, and R003, combined, shall not exceed 25.0 tons per rolling, 12-month period.

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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 R001, R002, and R003, combined, shall not exceed 25.0 tons of VOC per rolling, 12-month period. The permittee has existing production records such that there is no need for first year monthly usage limitations.

3. The hours of operation of this emissions unit shall not exceed 93 hours per week.

4. The n-butyl acetate content of the coatings shall not exceed 3.11 pounds per gallon, as applied.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that document all time periods during which 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 during which any photochemically reactive material is employed in this emissions unit:

   a. the company identification for each coating and photochemically reactive cleanup material employed;

   b. the number of gallons of each coating and photochemically reactive cleanup material employed minus the number of gallons of each coating and photochemically reactive cleanup material recovered for disposal;

   c. the OC content of each coating and photochemically reactive cleanup material, in pounds OC per gallon;

   d. the total emissions rate for all the coatings and photochemically reactive cleanup materials, in pounds OC per day;

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

   f. the average hourly OC emission rate for all the coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);

g. the VOC content of each coating and photochemically reactive cleanup material, in pounds VOC per gallon; and

h. the total emissions rate for all coatings and photochemically reactive cleanup materials, in pounds VOC per day.

[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 day during which no photochemically reactive materials are employed in this 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.

4. The permittee shall maintain records of the n-butyl acetate content of each coating and cleanup material, as applied, in pounds per gallon.

5. The permittee shall record the total number of hours the emissions unit was in operation during each week; i.e., sum of (C.2.e plus C.3.f).

6. The permittee shall collect and record the following information for each month for the emissions unit:

a. the number of gallons of each nonphotochemically reactive cleanup material

employed minus the number of gallons of cleanup material recovered for disposal;

b. the volatile organic compound (VOC) content of each nonphotochemically cleanup material, in lbs/gallon;

c. the total VOC emissions from all nonphotochemically reactive 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.h, for the calendar month + the summation of the daily VOC emissions, from section C.3.e, for the calendar month + the monthly non-photochemically reactive cleanup material VOC emissions from section C.6.c) divided by 2000 lbs/ton].

7. The permittee shall calculate and record the following information for each month for emissions units R001 through R003, combined:

a. the total VOC emissions for all the coatings and cleanup materials employed, in tons (calculated by summing the VOC emissions for R001, R002, and R003; and

b. the rolling, 12-month VOC emissions, in tons.

8. The permit to install for this emissions unit [R002] and emissions units R001, R002, and R003, combined were 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 units R001, R002, and R003, combined:

Compound: n-butyl acetate

TLV (mg/m3): 712.6

Emissions Unit ID: **R002**

Maximum Hourly Emission Rate (lbs/hr): 34.84

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 30,217

Adjusted MAGLC (ug/m3): 30,651

9. 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 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.

10. 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 Director 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 Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

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

    a. for the days during which any photochemically reactive material was employed, each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such day;

    b. for the days during which no photochemically reactive materials were employed, 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;

    c. 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;

    d. all exceedances of the rolling, 12-month VOC emission limitation, and the actual VOC emissions during such period;

    e. any exceedence of the weekly hours of operation limitation, and the actual hours

operated; and

f. any exceedance of the n-butyl acetate content limitation for any coating, as applied, and the actual n-butyl acetate content of each such coating.

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 from emissions units R001, R002, and R003, combined. The reports shall include the emission 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:

8 pounds per hour of OC emissions for each day during which any photochemically reactive material is employed

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may 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 OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

40 pounds per day of OC emissions for each day during which any photochemically reactive material is employed

Applicable Compliance Method:

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

c. Emission Limitation:

17.56 pounds per hour of VOC emissions for each day during which no photochemically reactive materials are employed

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined based upon the record keeping requirements specified in section C.3 of this permit.

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

d. Emission Limitation:

25.0 tons of VOC emissions per rolling, 12-month period from all the coatings and cleanup materials (for emissions units R001, R002, and R003, 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, C.6 and C.7 of this permit.

e. Emission Limitation:

5.32 pounds of VOC per gallon coating, as applied

Emissions Unit ID: **R002**

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.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(D), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.8, C.9, and C.10.

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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 - (R003) - Manual spray coating operation to finish wood furniture consisting of one coating booth with dry overspray filters, one air-assisted spray gun/pump. Parts are manually moved and air dried.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.b, A.2.c, B.1, B.3 and B.4 below. The requirements of this rule also include compliance with 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 and B.2 below.

2. Additional Terms and Conditions

2.a On any day during which any photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all the coatings and photochemically reactive cleanup materials shall not exceed 8 pounds per hour and 40 pounds per day. [OC emissions from any cleanup material that is not a photochemically reactive material shall not be counted towards the 8 lbs/hr and 40 lbs/day limitations.]

2.b On any day during which no photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are employed, the volatile organic compounds (VOC) emissions from all the coatings shall not exceed 17.56 pounds per hour. [This emission limitation is based upon the maximum application rate of 3.3 gallons per hour.]

2.c The VOC content of each coating shall not exceed 5.32 pounds per gallon, as applied.

2.d The VOC emissions from all the coatings and cleanup materials for emissions

Issued: To be entered upon final issuance

units R001, R002, and R003, combined, shall not exceed 25.0 tons per rolling, 12-month period.

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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 R001, R002, and R003, combined, shall not exceed 25.0 tons of VOC per rolling, 12-month period. The permittee has existing production records such that there is no need for first year monthly usage limitations.

3. The hours of operation of this emissions unit shall not exceed 93 hours per week.

4. The n-butyl acetate content of the coatings shall not exceed 3.11 pounds per gallon, as applied.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that document all time periods during which 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 during which any photochemically reactive material is employed in this emissions unit:

   a. the company identification for each coating and photochemically reactive cleanup material employed;

   b. the number of gallons of each coating and photochemically reactive cleanup material employed minus the number of gallons of each coating and photochemically reactive cleanup material recovered for disposal;

   c. the OC content of each coating and photochemically reactive cleanup material, in pounds OC per gallon;

   d. the total emissions rate for all the coatings and photochemically reactive cleanup materials, in pounds OC per day;

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

   f. the average hourly OC emission rate for all the coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);

g. the VOC content of each coating and photochemically reactive cleanup material, in pounds VOC per gallon; and

h. the total emissions rate for all coatings and photochemically reactive cleanup materials, in pounds VOC per day.

[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 day during which no photochemically reactive materials are employed in this 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.

4. The permittee shall maintain records of the n-butyl acetate content of each coating and cleanup material, as applied, in pounds per gallon.

5. The permittee shall record the total number of hours the emissions unit was in operation during each week; i.e., sum of (C.2.e plus C.3.f).

6. The permittee shall collect and record the following information for each month for the emissions unit:

a. the number of gallons of each nonphotochemically reactive cleanup material

employed minus the number of gallons of cleanup material recovered for disposal;

b. the volatile organic compound (VOC) content of each nonphotochemically cleanup material, in lbs/gallon;

c. the total VOC emissions from all nonphotochemically reactive 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.h, for the calendar month + the summation of the daily VOC emissions, from section C.3.e, for the calendar month + the monthly nonphotochemically reactive cleanup material VOC emissions from section C.6.c) divided by 2000 lbs/ton].

7. The permittee shall calculate and record the following information for each month for emissions units R001 through R003, combined:

a. the total VOC emissions for all the coatings and cleanup materials employed, in tons (calculated by summing the VOC emissions for R001, R002, and R003; and

b. the rolling, 12-month VOC emissions, in tons.

8. The permit to install for this emissions unit [R003] and emissions units R001, R002, and R003, combined, were 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 units R001, R002, and R003, combined:

Compound: n-butyl acetate

TLV (mg/m3): 712.6

Emissions Unit ID: **R003**

Maximum Hourly Emission Rate (lbs/hr): 34.84

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 30,217

Adjusted MAGLC (ug/m3): 30,651

. 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 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.

10. 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 Director 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 Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

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

    a. for the days during which any photochemically reactive material was employed, each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such day;

    b. for the days during which no photochemically reactive materials were employed, 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;

    c. 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;

    d. all exceedances of the rolling, 12-month VOC emission limitation, and the actual VOC emissions during such period;

    e. any exceedence of the weekly hours of operation limitation, and the actual hours

operated; and

f. any exceedance of the n-butyl acetate content limitation for any coating, as applied, and the actual n-butyl acetate content of each such coating.

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 from emissions units R001, R002, and R003, combined. The reports shall include the emission 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:

8 pounds per hour of OC emissions for each day during which any photochemically reactive material is employed

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation may 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 OC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

40 pounds per day of OC emissions for each day during which any photochemically reactive material is employed

Applicable Compliance Method:

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

c. Emission Limitation:

17.56 pounds per hour of VOC emissions for each day during which no photochemically reactive materials are employed

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation may be determined based upon the record keeping requirements specified in section C.3 of this permit.

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

d. Emission Limitation:

25.0 tons of VOC emissions per rolling, 12-month period from all the coatings and cleanup materials (for emissions units R001, R002, and R003, 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, C.6 and C.7 of this permit.

e. Emission Limitation:

5.32 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.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(D), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.8, C.9, and C.10.