

Facility ID: 0285000418 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit P001](#)
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Facility ID: 0285000418 Emissions Unit ID: P001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking operation controlled by a 5,000 acfm, return air dust collector and the associated wood waste loadout	OAC rule 3745-31-05(A)(3) (PTI 02-20280 Effective 1/20/2005)	See A.2.a, A.2.b, A.2.c, B.2 and B.3 below.
	OAC rule 3745-17-07(B)	Exempt due to location in non-Appendix A area.
	OAC rule 3745-17-08(B)	Exempt due to location in non-Appendix A area.
	OAC rule 3745-17-11	Less stringent than OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Less stringent than OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) Particulate emissions (PE) shall not exceed 0.01 grain per dscf of exhaust gas, 0.43 pound per hour and 1.9 tons per year from the dust collector exhaust.
No visible emissions from the dust collector exhaust.
Visible emissions shall not exceed 20% opacity as a 3-minute average from fugitive particulate emissions during loadout.

B. Operational Restrictions

1. The pressure drop across the dust collector shall be maintained within the manufacturer's recommended range while the emissions unit is in operation, or within the pressure drop range established during the most recent compliance inspection or stack test that determined the emissions unit was in compliance.
2. The dust collector shall be operated with a sufficient volumetric flow rate to eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.
3. During any unloading of sawdust into trucks from the cyclone dust collector silo, every attempt shall be made to reduce or control fugitive dust emissions by minimizing the drop height to the truck, utilizing a truck with high side boards, or placing a covering over the discharge chute during the unloading process. The collection efficiency shall be considered adequate if there are no visible particulate emissions of fugitive dust from the fabric tube during wood waste storage silo load-out in excess of 20% opacity, as a 3-minute average.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the dust collector while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the dust collector on a weekly basis.
2. When the dust collector is vented outside the building, the permittee shall perform weekly checks for any visible particulate emissions from the exhaust of the dust collector. The presence or absence of any visible emissions from the exhausts of the dust collectors shall be noted in an operations log. If any visible emissions are observed, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

NOTE: The exhaust from the dust collector for this emissions unit are currently vented back into the building.

This is the normal operating mode for this emissions unit.

3. The permittee shall record in an operations log any time the telescoping fabric tubes on the hopper and fabric covered conveyor used to load out sawdust are not in use when sawdust load out is in operation.
4. The permittee shall maintain copies of these records for a period of at least five years. Those records should be made available for Ohio EPA or their representatives to review during normal working hours.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the dust collect did not comply with the allowable range specified above, and the corrective measures taken.
2. The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any weekly record showing that visible emissions from the baghouse exhaust were noted in the operations log when the dust collector was vented outside. The notification 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.
3. The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any daily record showing the telescoping fabric tubes were not used and the conveyor was not covered while the sawdust load out was in operation. The notification 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.
4. The permittee shall also submit an annual report that includes:
 - a. a statement of each allowable emissions limit and operational restriction in Sections A.1, A.2 and B;
 - b. a statement whether the emissions unit is in compliance with the emissions limits and the operational restrictions, the cause for any deviation and any corrective action taken.

The report shall be submitted to the Director (Ohio EPA, Northeast District Office) by February 1 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
Particulate emissions shall not exceed 0.01 gr/dscf and 0.43 pound per hour.

Applicable Compliance Methods:

If required compliance shall be determined according to OAC rule 3745-17-03(B)(10), (Method 5, 40 CFR 60, Appendix A).

Emission Limitation:

Particulate emissions shall not exceed 1.9 tons per year.

Applicable Compliance Methods:

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

$$(0.055 \text{ gr/dscf}) \times (5,000 \text{ cfm}) \times (60 \text{ min/hr}) \times (8760 \text{ hr/yr}) \times (\text{lb}/7000 \text{ gr}) \times (\text{ton}/2000 \text{ lb}) \times (1-.99)$$

where:

0.055 gr/dscf is the emission factor from AP-42, table 10.4-1 version 4/78;

5,000 cfm is the dust collector flow rate; and

99% is the dust collector control efficiency

Emission Limitation:

No visible emissions from the dust collector exhaust.

Applicable Compliance Methods:

Compliance with the no visible emission limit for the exhausts from the dust collector shall be determined using Test Method 22-like visible emission observations. (Although Test Method 22 applies to fugitive emissions units, the visible/no visible emissions observation technique of Test Method 22 can be applied to ducted emissions, i.e., Test Method 22-like visible emission observations.)

Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:

If required, compliance with the visible fugitive emission limitation shall be determined by OAC rule 3745-17-03 (B)(3), in accordance with Method 9, as set forth in 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. None

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Facility ID: 0285000418 Emissions Unit ID: P002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodworking operation controlled by a 10,000 acfm, return air dust collector and associated wood waste load out	OAC rule 3745-31-05(A)(3) (PTI 02-20280 Effective 1/20/2005)	See A.2.a, A.2.b, A.2.c, B.2 and B.3 below.
	OAC rule 3745-17-07(B)	Exempt due to location in non-Appendix A area.
	OAC rule 3745-17-08(B)	Exempt due to location in non-Appendix A area.
	OAC rule 3745-17-11	Less stringent than OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Less stringent than OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- (a) Particulate emissions (PE) shall not exceed 0.01 grain per dscf of exhaust gas, 0.86 pound per hour and 3.8 tons per year from the dust collector exhaust.
No visible emissions from the dust collector exhaust.
Visible emissions shall not exceed 20% opacity as a 3-minute average from fugitive particulate emissions during loadout.

B. Operational Restrictions

1. The pressure drop across the dust collector shall be maintained within the manufacturer's recommended range while the emissions unit is in operation, or within the pressure drop range established during the most recent compliance inspection or stack test that determined the emissions unit was in compliance.
2. The dust collector shall be operated with a sufficient volumetric flow rate to eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.
3. During any unloading of sawdust into the trailer, every attempt shall be made to reduce or control fugitive dust emissions by minimizing the drop height to the truck, utilizing a truck with high side boards, or placing a covering over the discharge chute during the unloading process. The collection efficiency shall be considered adequate if there are no visible particulate emissions of fugitive dust from the fabric tube during wood waste storage load-out in excess of 20% opacity, as a 3-minute average.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the dust collector while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the dust collector on a weekly basis.
2. When the dust collector is vented outside the building, the permittee shall perform weekly checks for any visible particulate emissions from the exhaust of the dust collector. The presence or absence of any visible emissions from the exhausts of the dust collectors shall be noted in an operations log. If any visible emissions are observed, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

NOTE: The exhaust from the dust collector for this emissions unit are currently vented back into the building. This is the normal operating mode for this emissions unit.
3. The permittee shall record in an operations log any time the telescoping fabric tube or other means to reduce drop height is not in use when sawdust load out is in operation.
4. The permittee shall maintain copies of these records for a period of at least five years. Those records should be made available for Ohio EPA or their representatives to review during normal working hours.

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the dust collect did not comply with the allowable range specified above, and the corrective measures taken.
2. The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any weekly record showing that visible emissions from the baghouse exhaust were noted in the operations log when the dust collector was vented outside. The notification 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.
3. The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any daily record showing the telescoping fabric tube was not used while the sawdust load out was in operation. The notification 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.

4. The permittee shall also submit an annual report that includes:
 - a. a statement of each allowable emissions limit and operational restriction in Sections A.1, A.2 and B;
 - b. a statement whether the emissions unit is in compliance with the emissions limits and the operational restrictions, the cause for any deviation and any corrective action taken.

The report shall be submitted to the Director (Ohio EPA, Northeast District Office) by February 1 of each year and shall cover the previous calendar year

E. Testing Requirements

1. Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
Particulate emissions shall not exceed 0.01 gr/dscf and 0.86 pound per hour.

Applicable Compliance Methods:
If required compliance shall be determined according to OAC rule 3745-17-03(B)(10), (Method 5, 40 CFR 60, Appendix A).
Emission Limitation:
Particulate emissions shall not exceed 3.8 tons per year.

Applicable Compliance Methods:
Compliance with this emission limitation shall be determined by the following equation:

$$(0.055 \text{ gr/dscf}) \times (10,000 \text{ cfm}) \times (60 \text{ min/hr}) \times (8760 \text{ hr/yr}) \times (\text{lb}/7000 \text{ gr}) \times (\text{ton}/2000 \text{ lb}) \times (1-99)$$

Where:
0.055 gr/dscf is the emission factor from AP-42, table 10.4-1 version 4/78;
10,000 cfm is the dust collector flow rate; and
99% is the dust collector control efficiency.
Emission Limitation:
No visible emissions from the dust collector exhaust.

Applicable Compliance Methods:
Compliance with the no visible emission limit for the exhausts from the dust collector shall be determined using Test Method 22-like visible emission observations. (Although Test Method 22 applies to fugitive emissions units, the visible/no visible emissions observation technique of Test Method 22 can be applied to ducted emissions, i.e., Test Method 22-like visible emission observations.)
Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity as a 3-minute average.

Applicable Compliance Method:
If required, compliance with the visible fugitive emission limitation shall be determined by OAC rule 3745-17-03 (B)(3), in accordance with Method 9, as set forth in 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. None

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Facility ID: 0285000418 Emissions Unit ID: R001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Stain booth equipped with dry overspray	OAC rule 3745-31-05(A)(3)	See A.2.b , A.2.c, A.2.d and B.1 below.

filters and one manual spray gun/pump to (PTI 02-20280 Effective 1/20/2005)
finish wood furniture. Parts manually moved
and air dried.

OAC rule 3745-21-07(G)(2) See A.2.a. below.
OAC rule 3747-17-11(C) See A.2.e below.

2. Additional Terms and Conditions

- (a) Each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and photochemically reactive cleanup material and from photochemically reactive materials shall not exceed 8 pounds per hour and 40 pound per day. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

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

Each day that photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are not employed, the volatile organic compound (VOC) emissions from coatings shall not exceed 17.5 pounds per hour, as a daily average. This limit is based upon the maximum application rate of 2.5 gallons per hour.

The requirement to comply with this emissions limitation only on days photochemically reactive coating or clean up material are employed shall cease on the date the U.S. EPA approves revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, this emissions limitation shall be effective every day the emissions unit is in operation.

The VOC emissions from all coatings and cleanup materials shall not exceed 38.5 tons per year. The VOC content of each coating shall not exceed 7.0 pounds per gallon, as applied.

The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

B. Operational Restrictions

1. The permittee shall operate and maintain the dry particulate filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.
2. The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

2. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup material are 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 coating and/or 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 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 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).]
- [Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, section C.2 will be voided entirely.]
3. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup materials are not employed in this emissions unit:
- a. the company identification for each coating or cleanup material employed;
- b. documentation that photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) was not used;
- c. the volatile organic compound (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 coating recovered for disposal;
- e. the total VOC emissions from all 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 coatings, i.e., (e)/(f), in lbs/hr.
- [Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the records required by this section shall be kept on a daily basis with no reference to photochemically reactive materials. Section C.3.b shall be void.]
4. The permittee shall collect and record each month for the non-photochemically reactive cleanup material employed:
- a. the volatile organic compound (VOC) content of each non-photochemically cleanup materials, in lbs/gallon as applied;
- b. the number of gallons of cleanup material employed minus the number of gallons of cleanup material recovered for disposal; and
- c. the total VOC emissions from all non-photochemically cleanup materials employed, in lbs/month, i.e., sum of (b) times (c).
- [Note: Records of nonphotochemically reactive cleanup material shall be recorded monthly according to section C.4 above. After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding any reference to "nonphotochemically reactive".]
5. The permittee shall collect and record the total VOC emissions for the previous calendar year for this emissions unit, (i.e., sum of C.2.h plus C.3.e plus C.4.c divided by 2000).
6. The permit to install for this emissions unit and emissions unit R002 were evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC) adjusted to reflect the operation hour limitation in this permit. The following summarizes the results of the modeling for the "worst case" pollutant(s) for emissions units R001 and R002, combined:
- Compound: n-butyl acetate
- TLV (mg/m3): 71.26
- Maximum Hourly Emission Rate (lbs/hr): 15.9
- Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9,449
- MAGLC (ug/m3): 16,967
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 still 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), 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 description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - 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;
 - for the days during which a 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 incidence;
 - for the days during which a photochemically reactive material was not employed, each day during which the average VOC emissions from the coatings and cleanup materials exceeded 17.5 pounds per hour, and the actual average VOC emissions for each such day; and
 - each day during which the VOC content of any coating exceeded 7.0 pounds per gallon and the actual VOC content of each such coatings employed;

The permittee shall identify the cause for the emission exceedance and any corrective action taken. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office).

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding section D.2.b and the opening phrase of section D.2.c that references photochemically reactive material.]

2. The permittee shall also submit an annual report that includes:
- a statement of each allowable emissions limit and operational restriction in Sections A.1, A.2 and B.1;
 - a statement whether the emissions unit is in compliance with the emissions limits and operational restriction and the cause for the emission exceedance or deviation and any corrective action taken; and
 - the total annual VOC emissions.

The report shall be submitted to the Director (Ohio EPA, Northeast District Office) by February 1 of each year and shall cover the previous calendar year

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
- Emissions Limitation:
OC emissions shall not exceed 8 pounds per hour for each day that photochemically reactive materials are employed.
- Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.f. based upon the record keeping specified in Section C.2.
- Emissions Limitation:
OC emissions shall not exceed 40 pounds per day for each day that photochemically reactive materials are employed.
- Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.d. based upon the record keeping specified in Section C.2.
- Emissions Limitation:

VOC emissions shall not exceed 17.5 pounds per hour for each day that photochemically reactive materials are not employed.

Applicable Compliance Method:
 Compliance shall be determined by the daily values calculated in C.3.g. based on the record keeping specified in Section C.3.
 Emissions Limitation:
 VOC emissions shall not exceed 38.5 tons per year from all coatings and cleanup material.

Applicable Compliance Method:
 Compliance shall be determined by the value recorded in C.5 based on the record keeping as specified in Section C.2, C.3 and C.4.
 Emissions Limitation:
 VOC content of the coating shall not exceed 7.0 pounds per gallon coating.

Applicable Compliance Method:
 Any determination of VOC content, solids contents, or density of coating 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 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.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding sections E.1.a and E.1.b, by voiding the reference to photochemically reactive materials in section E.1.c. and by voiding the reference to section C.2 in section E.1.d.]

F. Miscellaneous Requirements

1. None

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0285000418 Emissions Unit ID: R002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Sealer/Topcoat booth to finish wood furniture. Parts air dried. Modified.	OAC rule 3745-31-05(A)(3) (PTI 02-21091mod1 Effective 10/4/2005)	See A.2.b , A.2.c, A.2.d and B.1 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 A.2.a. below.
	OAC rule 3745-31-05(C)	See A.2.c and B.2 below.
	OAC rule 3745-17-11(C)	See A.2.e below.

2. Additional Terms and Conditions

- (a) Each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and photochemically reactive cleanup material and from photochemically reactive materials shall not exceed 8 pounds per hour and 40 pound per day. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

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

Each day that photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are not employed, the volatile organic compound (VOC) emissions from coatings shall not exceed 13.95 pounds per hour. This limit is based upon the maximum application rate of 2.5 gallons per hour.

The requirement to comply with this emissions limitation only on days photochemically reactive coating or clean up material are employed shall cease on the date the U.S. EPA approves revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, this emissions limitation shall be effective every day the emissions unit is in operation.

The VOC emissions from all coatings and cleanup materials shall not exceed 50.6 tons per year, as a rolling, 12-month summation.

The VOC content of coatings shall not exceed 5.58 pounds per gallon, as applied.

The permittee shall operate the dry particulate filter whenever this emissions unit is in operation.

B. Operational Restrictions

1. The permittee shall operate and maintain the dry particulate filter system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.
The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.
2. The maximum coating and clean up material usage for this emissions unit, shall not cause emissions to exceed 50.2 tons of VOC per rolling, 12-months. The permittee has existing coating and cleanup material usage records such that there was no need for first year monthly VOC emission limitations.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
2. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup material are 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 coating and/or 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 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 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).]

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

3. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup materials are not employed in this emissions unit:
- the company identification for each coating or cleanup material employed;
 - documentation that photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) was not used;
 - the volatile organic compound (VOC) content of each coating, in lbs/gallon as applied;
 - the number of gallons of each coating employed minus the number of gallons of coating recovered for disposal;
 - the total VOC emissions from all coatings employed, in lbs/day, i.e., sum of (c) times (d);
 - the total number of hours the emissions unit was in operation; and
 - the average hourly VOC emission rate for all coatings, i.e., (e)/(f), in lbs/hr.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the records required by this section shall be kept on a daily basis with no reference to photochemically reactive materials. Section C.3.b shall be void.]

4. The permittee shall collect and record the following information for each month for the emissions unit:
- the number of gallons of each non-photochemically reactive cleanup material employed minus the number of gallons of cleanup material recovered for disposal;
 - the volatile organic compound (VOC) content of each non-photochemically reactive cleanup material, in lbs/gallon;
 - the total VOC emissions from all non-photochemically reactive cleanup materials employed, in lbs/day, i.e., sum of (b) times (a); and
 - the actual VOC emissions for the previous, 12-month period [i.e., sum of the daily VOC emissions (terms C.2.h + C.3.e) and the monthly non-photochemically reactive cleanup material VOC emission (term C.4.c) for the previous, 12-month period].

[Note: Records of nonphotochemically reactive cleanup material shall be recorded monthly according to section C.4 above. After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding any reference to "nonphotochemically reactive". The reference to section C.2.h shall be void.]

5. The permit to install for this emissions unit and emissions unit R001 were evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC) adjusted to reflect the operation hour limitation in this permit. The following summarizes the results of the modeling for the "worst case" pollutant(s) for emissions units R001 and R002, combined:

Compound: n-butyl acetate

TLV (mg/m3): 71.26

Maximum Hourly Emission Rate (lbs/hr): 15.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 9,449

MAGLC (ug/m3): 16,967

6. 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 still 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:
- changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

7. 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 description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - 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

- The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry particulate filter was not in service when the emissions unit was in operation. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- The permittee submit quarterly deviation (excursion) reports that identify:
 - for the days during which a 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 incidence;
 - for the days during which a photochemically reactive material was not employed, each day during which the average VOC emissions from the coatings exceeded the pounds per hour limitation specified above, and the actual average VOC emissions for each such day;
 - each day during which the VOC content of any coating exceeded the pounds per gallon limitation specified above and the actual VOC content of each such coatings employed; and
 - any exceedence of the annual VOC* emission limitation, as a rolling, 12-month summation, and the actual VOC emissions during such period.

*based upon the premise that 100% of the solvent in the coating and clean up material employed is emitted.

The report shall be submitted according to the General Terms and Conditions.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding section D.2.a and the opening phrase of section D.2.b that references photochemically reactive material.]

- The permittee shall also submit an annual report of the total annual VOC emissions from this emissions unit.

The report shall be submitted to the Director (Ohio EPA, Northeast District Office) by February 1 of each year and shall cover the previous calendar year

E. Testing Requirements

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

Emissions Limitation:
OC emissions shall not exceed 8 pounds per hour for each day that photochemically reactive materials are employed.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.f. based upon the record keeping specified in Section C.2

Emissions Limitation:
OC emissions shall not exceed 40 pounds per day for each day that photochemically reactive materials are employed.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.d based upon the record keeping specified in Section C.2.

Emissions Limitation:
VOC emissions shall not exceed 13.95 pounds per hour for each day that photochemically reactive materials are not employed.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.3.g. based on the record keeping specified in Section C.3.

Emissions Limitation:
VOC emissions shall not exceed 50.2 tons per year, as a rolling, 12-month summation, from all coatings and cleanup material.

Applicable Compliance Method:
Compliance shall be determined by the value recorded in C.4.d based on the record keeping as specified in Section C.2, C.3 and C.4.

Emissions Limitation:

VOC content of the coating shall not exceed 5.58 pounds per gallon coating, as applied.

Applicable Compliance Method:

Any determination of VOC content, solids contents, or density of coating 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 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.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding sections E.1.a and E.1.b, by voiding the reference to photochemically reactive materials in section E.1.c. and by voiding the reference to section C.2 in section E.1.d.]

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-F, except C.5, C.6 and C.7.