Facility ID: 0285020311 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.

Facility ID: 0285020311 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Application of finish to wood moulding by an inline spray machine. Coatings air dried.	OAC rule 3745-31-05(A)(3) (PTI 02-21422 - modified permit effective 5/9/06)	See sections A.2.b , A.2.c, A.2.d, B.1, B.3 and B.4 below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31-05(C).
	OAC rule 3745-21-07(G)	See section A.2.a below.
	OAC rule 3745-31-05(C)	See sections A.2.c, A.2.e, B.2 and B.3 below.

2. **Additional Terms and Conditions**

   (a) Each day that a photochemically reactive material [as defined in OAC rule 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 pounds per day. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with this limit.
   Each day that photochemically reactive materials [as defined in OAC rule 3745-21-01(C)(5)] are not employed, the volatile organic compound (VOC) emissions from coatings shall not exceed 38.3 pounds per hour. This limit is based upon the maximum application rate of 6.0 gallons per hour.
   The VOC emissions from all coatings and cleanup materials from emissions unit R002 and from emissions units R001, R002 and Z001, combined, shall not exceed 25.0 tons per year, as a rolling, 12-month summation.
   The VOC content of coatings shall not exceed 6.39 pounds per gallon, as applied.
   Total emissions from emissions units R001, R002 and Z001, combined, shall not exceed 9.9 tons per year of each individual hazardous air pollutant (HAP) and 24.9 tons per year of total combined HAPs, based upon a rolling, 12-month summation.

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 coating and clean up material usage for emissions unit R002 and for emissions unit R001, R002 and Z001, combined, shall not cause emissions to exceed 25.0 tons of VOC, 9.9 tons of an individual HAP or 24.9 tons of total combined HAPs per rolling, 12-month period. The permittee has existing coating and clean up material usage records such that there is no need for first year monthly VOC emission limitations.

3. The hours of operation of emissions unit R002 shall not exceed 66 hours per week.

4. The n-butanol content of all the coatings employed in emissions unit R002 shall not exceed 0.75 pound per gallon, as applied.

C. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.

2. The permittee shall collect and record the following information for each day 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 of 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 of VOC per gallon; and

h. the total emission rate for all coatings and photochemically reactive cleanup materials, in pounds of 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 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 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.

4. The permittee shall maintain records of the n-butanol content of each coating, as applied, in pounds per gallon.

5. The permittee shall record each week the total number of hours the emissions unit was in operation; i.e., sum of (2.e plus 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 non-photochemically reactive cleanup material employed minus the number of gallons of cleanup material recovered for disposal;

b. the VOC content of each non-photochemically cleanup material, in lbs/gallon;

c. the total VOC emissions from all non-photochemically reactive cleanup materials employed, in lbs/month, i.e., sum of (b) times (a);

d. the actual VOC emissions from all coatings and cleanup materials for the previous, 12-month period [i.e., sum of the daily VOC emissions (sections C.2.h + C.3.e) and the monthly non-photochemically reactive cleanup material VOC emission (section C.6.c) for the previous, 12-month period]; and

e. the actual VOC emissions from emissions units R001, R002 and Z001, combined, for the previous, 12-month period.

7. The permittee shall collect and record the following information each month for emissions units R001, R002 and Z001, combined:

a. the name and identification number of each coating and cleanup material, as applied;

b. the number of gallons of each coating and cleanup material employed;

c. the individual HAP* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon of coating, as applied;

d. the total individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month, i.e., for each HAP the sum of (b) times (c) for each coating and cleanup material, divided by 2000 lbs/ton;

e. the rolling, 12-month summation of the emissions of each individual HAP from emissions units R001, R002 and Z001, combined, for the previous 12-month period, i.e., the summation of (d) in tons per rolling, 12-month period;

f. the total combined HAPs* content for all HAPs of each coating and cleanup material, in pounds of total combined HAPs per gallon of coating, as applied;

g. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month,

i.e., the sum of (b) times (f) for each coating and cleanup material, divided by 2000 lbs/ton; and

h. the rolling, 12-month summation of the emissions of total combined HAPs from emissions units R001, R002 and Z001, combined, for the previous 12-month period, i.e., the summation of (g) in tons per rolling, 12-month period.

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

8. The permit to install for emissions units R001 and R002 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s) for emissions units R001 and R002, combined:

Compound: n-butanol

TLV (mg/m3): 60.63

Maximum Hourly Emission Rate (lbs/hr): 6.42

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3,532

Adjusted MAGLC (ug/m3): 3,675

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 (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the 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 a photochemically reactive material was employed, each day during which the average 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;

b. for the days during which a photochemically reactive material was not employed, each day during which the average VOC emissions from the coatings exceeded 38.3 pounds per hour, 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 specified

above and the actual VOC content of each such coatings employed;

d. 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 cleanup material employed is emitted.

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

f. any exceedence of the rolling, 12-month emissions limitation for each individual HAP from emissions units R001, R002 and Z001, combined, and the actual individual HAP emissions during such period;

g. any exceedence of the rolling, 12-month emission limitation for total combined HAPs from emissions units R001, R002 and Z001, combined, and the actual total combined HAPs emissions during such period; and

h. any exceedance of the n-butanol content limitation for any coating, as applied, and the actual n-butanol content of 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 following information:

a. the emissions of VOC from this emissions unit;

b. the emissions of each individual HAP from emissions units R001, R002 and Z001, combined; and

c. the emissions of total combined HAPs from emissions units R001, R002 and Z001, combined.

The reports shall include the emissions calculations, 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:
Emission Limitation:

8 pounds per hour of OC emissions for each day that photochemically reactive materials are employed

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in section C.2.f based upon the record keeping requirements specified in section C.
Emission Limitation:

40 pounds per day of OC emissions for each day that photochemically reactive materials are employed

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in section C.2.d based upon the record keeping requirements specified in section C.2.
Emission Limitation:

38.3 pounds of VOC emissions per hour for each day that photochemically reactive materials are not employed

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in section C.3.g based upon the record keeping requirements specified in section C.3.
Emission Limitation:

25.0 tons of VOC emissions per year from all coatings and cleanup material from emissions unit R001 and from emissions units R001, R002 and Z001, combined

Applicable Compliance Method:

Compliance shall be demonstrated by the values recorded in sections C.6.d and C.6.e based upon the record keeping requirements specified in sections C.2, C.3 and C.6.
Emission Limitation:

6.39 pounds of VOC per gallon coating, as applied

Applicable Compliance Method:

Any determination of VOC content, solids contents, or density of coating material shall be based upon the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials or from data determined by an analysis of each coating, as applied, by 40 CFR Part 60, Appendix A, Method 24 or Method 24A.
Emission Limitation:

9.9 tons of each individual HAP, based upon a rolling, 12-month summation for emissions units R001, R002 and Z001, combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.7.e.

Emission Limitation:

24.9 tons of total combined HAPs, based upon a rolling, 12-month summation for emissions units R001, R002 and Z001, combined

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section C.7.h.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the coatings and cleanup materials employed in the emissions unit.

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 B.3, B.4, C.4, C.5, C.8, C.9, C.10, D.2.e and D.2.h.