



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
WAYNE COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-22678

Fac ID: 0285000461

DATE: 10/30/2007

P. Graham Dunn, Inc.
Peter Dunn
1417 Zuercher Rd.
Dalton, OH 44618

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

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

CC: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 10/30/2007
Effective Date: 10/30/2007**

FINAL PERMIT TO INSTALL 02-22678

Application Number: 02-22678
Facility ID: 0285000461
Permit Fee: **\$1200**
Name of Facility: P. Graham Dunn, Inc.
Person to Contact: Peter Dunn
Address: 1417 Zuercher Rd.
Dalton, OH 44618

Location of proposed air contaminant source(s) [emissions unit(s)]:
**630 Henry St.
Dalton, Ohio**

Description of proposed emissions unit(s):
5 wood furniture coating booths, woodworking equipment.

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

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

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 (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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

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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)

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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.

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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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	10.0 TPY
OC/VOC	25.0 TPY

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (P001) - CNC routes, saws, routers, shapers and sanders controlled by a 39,400 acfm baghouse, and the associated wood waste silo load-out

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C)	Particulate emissions (PE) shall not exceed 9.9 tons/yr from the woodworking operations and silo unloading. See section A.2.a below.
OAC rule 3745-17-11(B)	PE shall not exceed 3.71 lbs/hr from the dust collector exhaust.
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
OAC rule 3745-17-08(B)	See section A.2.b below.
OAC rule 3745-17-07(B)	See section A.2.c below.

2. Additional Terms and Conditions

- 2.a Permit to Install 02-22678 for this air contaminant source takes into account the use of a baghouse system, whenever this air contaminant source is in operation, with a minimum control efficiency of 99.9% and capture efficiency of 100%, by weigh for PE, and the use of telescopic tube or other drop height reduction equipment during wood waste unloading, as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).
- 2.b The permittee is not located within an "Appendix A" area as identified in OAC rule 3745-17-08. Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).
- 2.c This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

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Emissions Unit ID: **P001**

Issued: 10/30/2007

B. Operational Restrictions

None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. The pressure drop across the baghouse shall be operated according to the manufacturer's recommendations, and within the manufacturer's recommended range while the emissions unit is in operation.

The permittee shall properly install, operate and maintain equipment to monitor the pressure drop across the baghouse 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 baghouse on a daily basis.

3. The permittee shall perform daily checks, when the emissions unit is in operation for any visible fugitive particulate emissions at the sawdust capture system pickup points. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

D. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Northeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the manufacturer's recommended range.
3. All reports shall be submitted in accordance with the General Terms and Conditions.

E. Testing Requirements

Issued: 10/30/2007

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

a. Emission Limitation:

PE shall not exceed 9.9 tons/yr from the woodworking operations and silo unloading.

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Applicable Compliance Method:

Compliance with the annual allowable PE limitation shall be determined by the following equation:

$$[(0.055 \text{ gr/dscf}) \times (39,400 \text{ cfm}) \times (60 \text{ min/hr}) \times (8760 \text{ hr/yr}) \times (\text{lb}/7000 \text{ gr}) \times (\text{ton}/2000 \text{ lb}) \times (1-.999)] + [(\text{SD}) \times (2 \text{ lbs/ton}) \times (\text{ton}/2000 \text{ lb}) \times (1-0.75)]$$

where:

0.055 gr/dscf is the particulate emission factor from AP-42, Table 10.4-1 version 2/80;

39,400 cfm is the dust collector flow rate;

99.9% is the dust collector control efficiency;

SD is the total tons of sawdust loaded out during the year, maximum of 205 tons per year;

2 lbs/ton is the particulate emission factor from AP-42, Table 10.4-1 (2/80) for sawdust loadout; and

75% is the control efficiency for a telescopic tube from RACM, Table 2.17-3.

b. Emission Limitation:

PE shall not exceed 3.71 lbs/hr from the dust collector exhaust.

Applicable Compliance Method:

If required, compliance with the PE limitation above shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be demonstrated in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-

03(B)(1).

F. Miscellaneous Requirements

1. The maximum uncontrolled annual emissions from this emissions unit would be approximately 66.87 tons from the woodworking operations and 0.21 ton from the silo unloading; therefore, the permittee elected a voluntary annual allowable PE limitation of 9.9 tons/yr to avoid BAT.
2. The visible particulate emissions periodic check language and requirement to operate the dust collection system within the manufacturer's recommended pressure drop has been included in the permit since the controlled PE rate is 2.26 lbs/hr and 0.0067 grain per dry standard cubic feet of exhaust to ensure that the baghouse is operating properly and in accordance with the manufacturer's specifications.

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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 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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (R001) - Manual coating operation No. 1 to apply water-based paint to wood pieces. Equipment consists of one manual, air assisted, airless gun/pump, booth with dry overspray filters and two associated IR drying ovens. Parts are manually moved.

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

2. Additional Terms and Conditions

- 2.a Each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compounds (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.
- 2.b Each day that photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are not employed, the volatile organic compounds (VOC) emissions from coatings shall not exceed 2.34 pounds per hour. This limit is based upon the maximum coating application rate of 2.75 gallons per hour.
- 2.c The VOC content of coatings shall not exceed 0.85 pound per gallon, as applied.

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- 2.d** The VOC emissions from all coatings and cleanup materials from this emissions unit, and from emissions units R001, R002, R003, R004 and R005, combined, shall not exceed 25.0 tons per year, as 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 emissions from coating and cleanup material usage for this emissions unit and for emissions units R001, R002, R003, R004 and R005, combined, shall not exceed 25.0 tons of VOC per rolling, 12-month period.
3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month	Maximum Allowable VOC (tons)
1	6.25
2	6.25
3	6.25
4	8.33
5	10.41
6	12.49
7	14.57
8	16.65
9	18.73
10	20.81
11	22.89
12	25.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the rolling, 12-month limitations of VOC shall be based upon the rolling, 12-month summations of the emissions of VOC.

Tons VOC emissions current month	+	Previous 11 months tons of VOC	Total 12-month < or = 25.0 tons VOC
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Emissions Unit ID: R001

Issued: 10/30/2007

C. Monitoring and/or Recordkeeping 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 OC per gallon;
 - d. the total emission 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.
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:

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

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- 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 employed;
 - 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 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 nonphotochemically reactive cleanup material recovered for disposal;
 - b. the VOC content of each nonphotochemically reactive 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);
 - 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 nonphotochemically reactive cleanup material VOC emission (section C.4.c) for the previous, 12-month period]; and
 - e. the actual VOC emissions from emissions units R001, R002, R003, R004 and R005, combined, for the previous, 12-month period.
5. Modeling to demonstrate compliance with ORC 3704.03(F)(4)(b) ["Review of New

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Sources of Air Toxics Emissions, Option A."] was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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 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 occurrence;
 - 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 2.34 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 0.85 pound per gallon, and the actual VOC content of each such coating employed; and
 - d. any exceedence of the annual VOC* emission limitation of 25.0 tons per year, as a rolling, 12-month summation, and the actual VOC emissions during each such period.

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

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 emissions of VOC from this emissions unit and from emissions units R001, R002, R003, R004 and R005, 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

Issued: 10/30/2007

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:

Issued: 10/30/2007

a. Emission Limitation:

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

Applicable Compliance Method:

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

b. Emission Limitation:

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

Applicable Compliance Method:

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

c. Emission Limitation:

2.34 pounds VOC emissions 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 section C.3.g based upon the record keeping requirements specified in section C.3.

d. Emission Limitation:

25.0 tons of VOC emissions per rolling, 12-month period from all coatings and cleanup material from this emissions unit and from emissions units R001, R002, R003, R004 and R005, combined

Applicable Compliance Method:

Compliance shall be determined by the values recorded in sections C.4.d and C.4.e based upon the record keeping requirements specified in sections C.2,

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C.3 and C.4.

e. Emission Limitation:

0.85 pound 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(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.5.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (R002) - Manual coating operation No. 2 to apply water-based paint to wood pieces. Equipment consists of one manual, air assisted, airless gun/pump, booth with dry overspray filters and two associated IR drying ovens. Parts are manually moved.

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

2. Additional Terms and Conditions

- 2.a Each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compounds (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.
- 2.b Each day that photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are not employed, the volatile organic compounds (VOC) emissions from coatings shall not exceed 2.34 pounds per hour. This limit is based upon the maximum coating application rate of 2.75 gallons per hour.
- 2.c The VOC content of coatings shall not exceed 0.85 pound per gallon, as applied.
- 2.d The VOC emissions from all coatings and cleanup materials from this emissions

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unit, and from emissions units R001, R002, R003, R004 and R005, combined, shall not exceed 25.0 tons per year, as 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 emissions from coating and cleanup material usage for this emissions unit and for emissions units R001, R002, R003, R004 and R005, combined, shall not exceed 25.0 tons of VOC per rolling, 12-month period.
3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month	Maximum Allowable VOC (tons)
1	6.25
2	6.25
3	6.25
4	8.33
5	10.41
6	12.49
7	14.57
8	16.65
9	18.73
10	20.81
11	22.89
12	25.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the rolling, 12-month limitations of VOC shall be based upon the rolling, 12-month summations of the emissions of VOC.

Tons VOC emissions current month	+	Previous 11 months tons of VOC	Total 12-month < or = 25.0 tons VOC
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C. Monitoring and/or Recordkeeping 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 OC per gallon;
 - d. the total emission 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.
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:

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

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- 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 employed;
 - 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 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 nonphotochemically reactive cleanup material recovered for disposal;
 - b. the VOC content of each nonphotochemically reactive 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);
 - 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 nonphotochemically reactive cleanup material VOC emission (section C.4.c) for the previous, 12-month period]; and
 - e. the actual VOC emissions from emissions units R001, R002, R003, R004 and R005, combined, for the previous, 12-month period.
5. Modeling to demonstrate compliance with ORC 3704.03(F)(4)(b) ["Review of New Sources of Air Toxics Emissions, Option A."] was not necessary because the emissions

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unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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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 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 occurrence;
 - 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 2.34 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 0.85 pound per gallon, and the actual VOC content of each such coating employed; and
 - d. any exceedence of the annual VOC* emission limitation of 25.0 tons per year, as a rolling, 12-month summation, and the actual VOC emissions during each such period.

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

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 emissions of VOC from this emissions unit and from emissions units R001, R002, R003, R004 and R005, 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:

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a. Emission Limitation:

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

Applicable Compliance Method:

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

b. Emission Limitation:

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

Applicable Compliance Method:

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

c. Emission Limitation:

2.34 pounds VOC emissions 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 section C.3.g based upon the record keeping requirements specified in section C.3.

d. Emission Limitation:

25.0 tons of VOC emissions per rolling, 12-month period from all coatings and cleanup material from this emissions unit and from emissions units R001, R002, R003, R004 and R005, combined

Applicable Compliance Method:

Compliance shall be determined by the values recorded in sections C.4.d and C.4.e based upon the record keeping requirements specified in sections C.2,

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C.3 and C.4.

e. Emission Limitation:

0.85 pound 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(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.5

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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 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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (R003) - Manual coating operation No. 3 to apply stain to wood pieces. Equipment consists of multiple manual, air gun/pump (only one used at a time) and booth with dry overspray filters. Parts are manually moved.

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

2. Additional Terms and Conditions

- 2.a Each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compounds (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.
- 2.b Each day that photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are not employed, the volatile organic compounds (VOC) emissions from coatings shall not exceed 21.22 pounds per hour. This limit is based upon the maximum coating application rate of 3.3 gallons per hour.
- 2.c The VOC content of coatings shall not exceed 6.43 pounds per gallon, as

Emissions Unit ID: R003

applied.

- 2.d** The VOC emissions from all coatings and cleanup materials from this emissions unit, and from emissions units R001, R002, R003, R004 and R005, combined, shall not exceed 25.0 tons per year, as a rolling, 12-month summation.

B. Operational Restrictions

- All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
- The maximum emissions from coating and cleanup material usage for this emissions unit and for emissions units R001, R002, R003, R004 and R005, combined, shall not exceed 25.0 tons of VOC per rolling, 12-month period.
- To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month	Maximum Allowable VOC (tons)
1	6.25
2	6.25
3	6.25
4	8.33
5	10.41
6	12.49
7	14.57
8	16.65
9	18.73
10	20.81
11	22.89
12	25.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the rolling, 12-month limitations of VOC shall be based upon the rolling, 12-month summations of the emissions of VOC.

Tons VOC emissions current month	+	Previous 11 months tons of VOC	Total 12-month < or = 25.0 tons VOC
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C. Monitoring and/or Recordkeeping 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 OC per gallon;
 - d. the total emission 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).]

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:

Emissions Unit ID: R003

- 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 employed;
 - 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 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 nonphotochemically reactive cleanup material recovered for disposal;
 - b. the VOC content of each nonphotochemically reactive 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);
 - 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 nonphotochemically reactive cleanup material VOC emission (section C.4.c) for the previous, 12-month period]; and
 - e. the actual VOC emissions from emissions units R001, R002, R003, R004 and R005, combined, for the previous, 12-month period.
5. The permit to install for this emissions unit R003, and R003, R004 and R005, combined, was evaluated based on the actual materials and the design parameters of

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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 evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m³): 188.4

Maximum Hourly Emission Rate (lbs/hr): 0.187

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,181

MAGLC (ug/m³): 4,4856

6. Prior to making any physical changes to or changes in the method of operation of the emissions unit), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification"

Emissions Unit ID: R003

under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

7. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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.

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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 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 occurrence;
 - 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 21.22 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 6.43 pounds per gallon, and the actual VOC content of each such coating employed; and
 - d. any exceedence of the annual VOC* emission limitation of 25.0 tons per year, as a rolling, 12-month summation, and the actual VOC emissions during each such period.

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

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 emissions of VOC from this emissions unit and from emissions units R001, R002, R003, R004 and R005, combined.

The reports shall include the emissions calculations, shall be submitted by January 31 of each year, and shall cover the previous calendar year.

4. The permittee shall submit annual reports that document any changes made to a parameter or value used in the dispersion model used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each 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 that photochemically reactive materials are employed

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

21.22 pounds VOC emissions 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 section C.3.g based upon the record keeping requirements specified in section C.3.
 - d. Emission Limitation:

25.0 tons of VOC emissions per rolling, 12-month period from all coatings and cleanup material from this emissions unit and from emissions units R001, R002, R003, R004 and R005, combined

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Applicable Compliance Method:

Compliance shall be determined by the values recorded in sections C.4.d and C.4.e based upon the record keeping requirements specified in sections C.2, C.3 and C.4.

e. Emission Limitation:

6.43 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.

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F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.5, C.6, C.7 and D.4.

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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 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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (R004) - Manual coating operation No. 4 to apply sealers and topcoats to wood pieces. Equipment consists of one manual, air assisted, airless gun/pump, booth with dry overspray filters and two associated IR drying ovens. Parts are manually moved.

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

2. Additional Terms and Conditions

- 2.a Each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compounds (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.
- 2.b Each day that photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are not employed, the volatile organic compounds (VOC) emissions from coatings shall not exceed 15.29 pounds per hour. This limit is based upon the maximum coating application rate of 2.75 gallons per hour.

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- 2.c The VOC content of coatings shall not exceed 5.56 pounds per gallon, as applied.
- 2.d The VOC emissions from all coatings and cleanup materials from this emissions unit, and from emissions units R001, R002, R003, R004 and R005, combined, shall not exceed 25.0 tons per year, as 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 emissions from coating and cleanup material usage for this emissions unit and for emissions units R001, R002, R003, R004 and R005, combined, shall not exceed 25.0 tons of VOC per rolling, 12-month period.
- 3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month	Maximum Allowable VOC (tons)
1	6.25
2	6.25
3	6.25
4	8.33
5	10.41
6	12.49
7	14.57
8	16.65
9	18.73
10	20.81
11	22.89
12	25.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the rolling, 12-month limitations of VOC shall be based upon the rolling, 12-month summations of the emissions of VOC.

Tons VOC emissions current month	+	Previous 11 months tons of VOC	Total 12-month < or = 25.0 tons VOC
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C. Monitoring and/or Recordkeeping 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 OC per gallon;
 - d. the total emission 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.
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

[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).]

Emissions Unit ID: **R004**

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 employed;
 - 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 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 nonphotochemically reactive cleanup material recovered for disposal;
 - b. the VOC content of each nonphotochemically reactive 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);
 - 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 nonphotochemically reactive cleanup material VOC emission (section C.4.c) for the previous, 12-month period]; and
 - e. the actual VOC emissions from emissions units R001, R002, R003, R004 and R005, combined, for the previous, 12-month period.
5. The permit to install for this emissions unit R004, and R003, R004 and R005,

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combined, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m³): 188.4

Maximum Hourly Emission Rate (lbs/hr): 0.187

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,181

MAGLC (ug/m³): 4,4856

6. Prior to making any physical changes to or changes in the method of operation of the emissions unit), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for

Emissions Unit ID: **R004**

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 a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

7. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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.

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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 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 occurrence;
 - 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 15.29 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 5.56 pounds per gallon, and the actual VOC content of each such coating employed; and
 - d. any exceedence of the annual VOC* emission limitation of 25.0 tons per year, as a rolling, 12-month summation, and the actual VOC emissions during each such period.

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

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 emissions of VOC from this emissions unit and from emissions units R001, R002, R003, R004 and R005, combined.

The reports shall include the emissions calculations, shall be submitted by January 31 of each year, and shall cover the previous calendar year.

4. The permittee shall submit annual reports that document any changes made to a parameter or value used in the dispersion model used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each 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 that photochemically reactive materials are employed

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

15.29 pounds VOC emissions 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 section C.3.g based upon the record keeping requirements specified in section C.3.
 - d. Emission Limitation:

25.0 tons of VOC emissions per rolling, 12-month period from all coatings and cleanup material from this emissions unit and from emissions units R001, R002, R003, R004 and R005, combined

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Applicable Compliance Method:

Compliance shall be determined by the values recorded in sections C.4.d and C.4.e based upon the record keeping requirements specified in sections C.2, C.3 and C.4.

e. Emission Limitation:

5.56 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.

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F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.5, C.6, C.7 and D.4.

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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 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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (R005) - Manual coating operation No. 5 to apply water-based paint to wood pieces. Equipment consists of one manual, air assisted, airless gun/pump, booth with dry overspray filters and two associated IR drying ovens. Parts are manually moved.

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

2. Additional Terms and Conditions

- 2.a Each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compounds (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.
- 2.b Each day that photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are not employed, the volatile organic compounds (VOC) emissions from coatings shall not exceed 15.29 pounds per hour. This limit is based upon the maximum coating application rate of 2.75 gallons per hour.

Emissions Unit ID: **R005**

- 2.c** The VOC content of coatings shall not exceed 5.56 pounds per gallon, as applied.
- 2.d** The VOC emissions from all coatings and cleanup materials from this emissions unit, and from emissions units R001, R002, R003, R004 and R005, combined, shall not exceed 25.0 tons per year, as a rolling, 12-month summation.

B. Operational Restrictions

- All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
- The maximum emissions from coating and cleanup material usage for this emissions unit and for emissions units R001, R002, R003, R004 and R005, combined, shall not exceed 25.0 tons of VOC per rolling, 12-month period.
- To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month	Maximum Allowable VOC (tons)
1	6.25
2	6.25
3	6.25
4	8.33
5	10.41
6	12.49
7	14.57
8	16.65
9	18.73
10	20.81
11	22.89
12	25.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the rolling, 12-month limitations of VOC shall be based upon the rolling, 12-month summations of the emissions of VOC.

Tons VOC emissions current month	+	Previous 11 months tons of VOC	Total 12-month < or = 25.0 tons VOC
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C. Monitoring and/or Recordkeeping 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 OC per gallon;
 - d. the total emission 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).]

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

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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 employed;
 - 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 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 nonphotochemically reactive cleanup material recovered for disposal;
 - b. the VOC content of each nonphotochemically reactive 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);
 - 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 nonphotochemically reactive cleanup material VOC emission (section C.4.c) for the previous, 12-month period]; and
 - e. the actual VOC emissions from emissions units R001, R002, R003, R004 and R005, combined, for the previous, 12-month period.

Emissions Unit ID: **R005**

5. The permit to install for this emissions unit R005, and R003, R004 and R005, combined, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m³): 188.4

Maximum Hourly Emission Rate (lbs/hr): 0.187

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2,181MAGLC (ug/m³): 4,4856

6. Prior to making any physical changes to or changes in the method of operation of the emissions unit), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC 3745-114-01, that was modeled from the initial (or last) application; and
 - physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for

Issued: 10/30/2007

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 a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

7. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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,

Emissions Unit ID: **R005**

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 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 occurrence;
 - 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 15.29 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 5.56 pounds per gallon, and the actual VOC content of each such coating employed; and
 - d. any exceedence of the annual VOC* emission limitation of 25.0 tons per year, as a rolling, 12-month summation, and the actual VOC emissions during each such period.

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

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 emissions of VOC from this emissions unit and from emissions units R001, R002, R003, R004 and R005, combined.

The reports shall include the emissions calculations, shall be submitted by January 31 of each year, and shall cover the previous calendar year.

4. The permittee shall submit annual reports that document any changes made to a parameter or value used in the dispersion model used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

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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 that photochemically reactive materials are employed

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

15.29 pounds VOC emissions 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 section C.3.g based upon the record keeping requirements specified in section C.3.
 - d. Emission Limitation:

25.0 tons of VOC emissions per rolling, 12-month period from all coatings and cleanup material from this emissions unit and from emissions units R001, R002,

Emissions Unit ID: **R005**

R003, R004 and R005, combined

Applicable Compliance Method:

Compliance shall be determined by the values recorded in sections C.4.d and C.4.e based upon the record keeping requirements specified in sections C.2, C.3 and C.4.

e. Emission Limitation:

5.56 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.

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F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except C.5, C.6, C.7 and D.4.

Emissions Unit ID: **R005**

SIC CODE 2499 SCC CODE 30702001 EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION CHC routes, saws, routers, shapers and sanders controlled by a 39,400 acfm baghouse, as the associated wood waste silo load-out

DATE INSTALLED after PTI issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.01lb/hr	0.24 tpy	n/a	9.9 tpy
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

No BAT, Installed after 8/4/06 and after control emissions are less than 10 tpy

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

P. Graham Dunn, Inc.
PTI Application: 02-22678
Issued: 10/30/2007

Facility ID: 0285000461

Emissions Unit ID: **R005**

SIC CODE 2499 SCC CODE 40201901 EMISSIONS UNIT ID R001

EMISSIONS UNIT DESCRIPTION Manual coating operation No. 1 to apply water-based paint to wood pieces. Equipment consists of one manual, air assisted, airless gun/pump, booth with dry overspray filters and two associated IR drying ovens. Parts are manual moved.

DATE INSTALLED after PTI issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	1.93 lbs/hr	3.26	2.34 lbs/hr	25.0 tpy facility-wide
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

0.85 lb/gal VOC, 2.34 lbs/hr VOC - based upon maximum operation of the source

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: toluene, xylene

Emissions Unit ID: **R005**

Issued: 10/30/2007

SIC CODE 2499 SCC CODE 40201901 EMISSIONS UNIT ID R002

EMISSIONS UNIT DESCRIPTION Manual coating operation No. 2 to apply water-based paint to wood pieces. Equipment consists of one manual, air assisted, airless gun/pump, booth with dry overspray filters and two associated IR drying ovens. Parts are manual moved.

DATE INSTALLED after PTI issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	1.93 lbs/hr	3.26	2.34 lbs/hr	25.0 tpy facility-wide
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

0.85 lb/gal VOC, 2.34 lbs/hr VOC, Use of dry filters for overspray control - based upon maximum operation of the source

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: toluene, xylene

P. Graham Dunn, Inc.
PTI Application: 02-22678
Issued: 10/30/2007

Facility ID: 0285000461

Emissions Unit ID: **R005**

SIC CODE 2499 SCC CODE 40201901 EMISSIONS UNIT ID R003

EMISSIONS UNIT DESCRIPTION Manual coating operation No. 3 to apply stain to wood pieces. Equipment consists of multiple manual, air gun/pump (only one used at a time) and booth with dry overspray filters. Parts are manual moved.

DATE INSTALLED after PTI issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	19.29 lbs/hr	unknown, new facility	21.22 lbs/hr	25.0 tpy facility-wide
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

6.43 lbs/gal VOC, 21.22 lbs/hr VOC, Use of dry filters for overspray control- based upon maximum operation of the source

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: toluene, xylene

Emissions Unit ID: **R005**

Issued: 10/30/2007

SIC CODE 2499 SCC CODE 40201901 EMISSIONS UNIT ID R004
 EMISSIONS UNIT DESCRIPTION Manual coating operation No. 4 to apply sealers and topcoats to wood pieces. Equipment consists of one manual, air assisted, airless gun/pump, booth with dry overspray filters and two associated IR drying ovens. Parts are manual moved.

DATE INSTALLED after PTI issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	13.90 lbs/hr	unknown, new facility	15.29 lbs/hr	25.0 tpy facility-wide
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

5.56 lbs/gal VOC, 15.29 lbs/hr VOC, Use of dry filters for overspray control- based upon maximum operation of the source

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: xylene, toluene

P. Graham Dunn, Inc.
PTI Application: 02-22678
Issued: 10/30/2007

Facility ID: 0285000461

Emissions Unit ID: **R005**

SIC CODE 2499 SCC CODE 40201901 EMISSIONS UNIT ID R005

EMISSIONS UNIT DESCRIPTION Manual coating operation No. 5 to apply water-based paint to wood pieces. Equipment consists of one manual, air assisted, airless gun/pump, booth with dry overspray filters and two associated IR drying ovens. Parts are manual moved.

DATE INSTALLED after PTI issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	13.90 lbs/hr	unknown, new facility	15.29 lbs/hr	25.0 tpy facility-wide
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

5.56 lbs/gal VOC, 15.29 lbs/hr VOC, Use of dry filters for overspray control- based upon maximum operation of the source

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: toluene, xylene