☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**
Permit To Install 02-21901

A. Source Description:

Swiss Woodcraft is a manufacturer and finisher of wood millwork and doors. This PTI is for the Chapter 31 modification of two wood coating operations.

B. Facility Emissions and Attainment Status

The facility is located in Wayne County, which is attainment for all criteria pollutants. The facility emits VOC from two permitted furniture finishing spray booths, one PTI exempt manual coating operation, and two PTI exempt boilers. The spray booth emissions units are subject to OAC rule 3745-21-07(G)(2). The facility-wide Potential to Emit are 249.1 tons of VOC emissions, 29.1 tons of single HAP and 52.5 tons of combined HAPs.

C. Source Emissions

R001 is a manual spray coating operation to finish wood millwork, previously permitted under PTI 02-15189 (12/5/90). The emissions unit uses both photochemically reactive and non-photochemically reactive coatings at this time. Coatings are air dried. Days when PRM is employed, the unit is subject to OAC rule 3745-21-07(G)(2). Potential VOC emissions are 73.1 tons per year.

R002 is a automated in line spray coating operation to finish wood millwork, previously permitted under PTI 02-18619 (11/18/03). The emissions unit uses both photochemically reactive and non-photochemically reactive coatings at this time. Coatings are air dried. Days when PRM is employed, the unit is subject to OAC rule 3745-21-07(G)(2). Potential VOC emissions are 168.2 tons per year.

Z001 is a manual staining operation to finish wood millwork and doors. This emissions unit is PTI exempt per OAC rule 3745-31-03(A)(1)(kk).

Other PTI exempt boilers are included in the calculations below.

The potential to emit for this facility:

EU	VOC (TPY)	combined HAP (TPY)	single HAP (TPY)
R001	73.1	17.5	9.7
R002	168.2	35.0	19.4
Z001	7.6	0	0
exempt boilers	0.2	0	0
Total	249.1	52.5	29.1

The allowable emissions including the federally enforceable limits in this PTI:

EU	VOC (TPY)	combined HAP (TPY)	single HAP (TPY)
R001, R002 and Z001	25	24.9	9.9
exempt boilers	0.2	0	0

Total	25.2	24.9	9.9

D. Conclusion

The federally enforceable limits for the coating VOC emissions, single HAP emissions and combined HAP emissions, as a rolling, 12-month summation, and the associated recordkeeping and reporting in this PTI is sufficient to reduce the facility's PTE for VOC below the Title V and MACT thresholds.

State of Ohio Environmental Protection Agency

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

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

Application No: 02-21422
Fac ID: 0285020311

DATE: 11/8/2005

Swiss Woodcraft, Inc.
Kenneth Maibach
15 Industrial St.
Rittman, OH 44270

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

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

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

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **NEDO**

WAYNE COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **02-21422** FOR AN AIR CONTAMINANT SOURCE FOR
Swiss Woodcraft, Inc.

On 11/8/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Swiss Woodcraft, Inc.**, located at **15 Industrial St., Rittman**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-21422:

Synthetic minor modification to avoid MACT applicability.

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

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

DRAFT PERMIT TO INSTALL 02-21422

Application Number:	02-21422
Facility ID:	0285020311
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Swiss Woodcraft, Inc.
Person to Contact:	Kenneth Maibach
Address:	15 Industrial St. Rittman, OH 44270

Location of proposed air contaminant source(s) [emissions unit(s)]:
15 Industrial St.
Rittman, Ohio

Description of proposed emissions unit(s):
Synthetic minor modification to avoid MACT applicability.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

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

conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
VOC	25.0 TPY
single HAP	9.9 TPY
combined HAPs	24.9 TPY

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R001 - Manual spray booth with one air-assisted spray gun to coat wood parts. Parts air-dried. Modified.	OAC rule 3745-31-05(A)(3)	See A.2.b , A.2.c, A.2.d, B.1, B.3 and B.4 below. The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2)
	OAC rule 3745-21-07(G)(2)	See A.2.a. below.
	OAC rule 3745-31-05(C)	See A.2.c, A.2.e, B.2 and B.3 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 compound (OC) emissions from all coatings and photochemically reactive cleanup material and from photochemically reactive materials shall not exceed 8 pounds per hour and 40 pound per day. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

2.b Each day that photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)]are not employed, the volatile organic compound (VOC) emissions from coatings shall not exceed 16.6 pounds per hour. This limit is

based upon the maximum application rate of 3.0 gallons per hour.

2.c The VOC emissions from all coatings and cleanup materials from R001, and R001, R002 and Z001 combined, shall not exceed 25.0 tons per year, as a rolling, 12-month summation.

2.d The VOC content of coatings shall not exceed 5.54 pounds per gallon, as applied.

2.e Total emissions from emissions units R001, R002, and Z001, combined shall not exceed 9.9 tons per year of each single hazardous air pollutant (HAP), 24.9 tons per year of combined HAP, based upon a rolling, 12-month summation.

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.

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

3. The hours of operation of this emissions unit shall not exceed 72 hours per week.

4. The n-butanol content of the coatings shall not exceed 0.31 pound per gallon, as applied.

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

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

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:

a. the company identification for each coating or cleanup material employed;

b. documentation that photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) was not used;

c. the volatile organic compound (VOC) content of each coating, in lbs/gallon as applied;

d. the number of gallons of each coating employed minus the number of gallons of coating recovered for disposal;

e. the total VOC emissions from all coatings employed, in lbs/day, i.e., sum of (c)

times (d);

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

g. the average hourly VOC emission rate for all coatings, i.e., (e)/(f), in lbs/hr.

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

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

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

   a. the number of gallons of each non-photochemically reactive cleanup material employed minus the number of gallons of cleanup material recovered for disposal;

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

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

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

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

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

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

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

c. the single Hazardous Air Pollutant (HAP)[1] content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon of coating, as applied;

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

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

f. the combined Hazardous Air Pollutants (HAPs)[1] content for all HAPs of each coating and cleanup material, in pounds of combined HAPs per gallon of coating, as applied;

g. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month, i.e., the sum of (b) times (f) for each coating and cleanup material divided by 2000;

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

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

8. The permit to install for this emissions unit and emissions unit R001 were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC) adjusted to reflect the operation hour limitation in this permit. The following summarizes the results of the modeling for the "worst case" pollutant(s) for emissions units R001 and R002,

combined:

Compound: n-butanol

TLV (mg/m3): 60.63

Maximum Hourly Emission Rate (lbs/hr): 2.88

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3,315

Adjusted MAGLC (ug/m3): 3,368

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other

provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

10. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

    a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

    b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

    c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

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

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

    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 the pounds per hour limitation specified above, and the actual average VOC emissions for each such day;

    c. each day during which the VOC content of any coating exceeded the pounds per gallon limitation specified above and the actual VOC content of each such coatings employed;

    d. any exceedence of the annual VOC* emission limitation, as a rolling, 12-month

summation, and the actual VOC emissions during such period;

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

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

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

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

h. any exceedance of the n-butanol content limitation for any coating, as applied, and the actual n-butanol content of each such coating.

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

3. The permittee shall also submit annual reports that summarize the following information:

a. the emissions of VOC from this emissions unit and from R001, R002 and Z001 combined;

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

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

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

E. Testing Requirements

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

   a. Emissions 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 C.2.f. based upon the record keeping specified in Section C.2.

   b. Emissions 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 C.2.d based upon the record keeping specified in Section C.2.

   c. Emissions Limitation:
   16.6 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 C.3.g. based on the record keeping specified in Section C.3.

   d. Emissions Limitation:
   25.0 tons of VOC emissions per year from all coatings and cleanup material from R001 and from R001, R002 and Z001, combined

   Applicable Compliance Method:
   Compliance shall be determined by the value recorded in C.6.d and C.6.e based on the record keeping as specified in Section C.2, C.3 and C.6.

   e. Emissions Limitation:
   5.54 pounds of VOC per gallon coating, as applied.

Applicable Compliance Method:
Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

f. Emissions Limitations:
9.9 tons of each single HAP, based upon a rolling, 12-month summation for R001, R002, and Z001, combined.

Applicable Compliance Method:
Compliance shall be based on the record keeping as specified in Sections C.7.e.

g. Emissions Limitations:
24.9 tons of each total combined HAPs, based upon a rolling, 12-month summation for R001, R002, and Z001, combined.

Applicable Compliance Method:
Compliance shall be based on the record keeping as specified in Sections C.7.h.

F. Miscellaneous Requirements

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emission unit contained in permit to install 02-15189 as issued on December 5, 1990.

2. In accordance with the provisions of OAC rule 3745-31-05(D), the following terms and conditions of this permit to install are federally enforceable: A-F, except B.3, B.4, C.4, C.5, C.8, C.9, C.10, D.2.e and D.2.h.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R002 - In Line spray booth with six spray guns to coat wood parts. Parts air-dried. Modified.	OAC rule 3745-31-05(A)(3)	See A.2.b , A.2.c, A.2.d, B.1, B.3 and B.4 below. The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2)
	OAC rule 3745-21-07(G)(2)	See A.2.a. below.
	OAC rule 3745-31-05(C)	See A.2.c, A.2.e, B.2 and B.3 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 compound (OC) emissions from all coatings and photochemically reactive cleanup material and from photochemically reactive materials shall not exceed 8 pounds per hour and 40 pound per day. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

2.b Each day that photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)]are not employed, the volatile organic compound (VOC) emissions from coatings shall not exceed 38.3 pounds per hour. This limit is based upon the maximum application rate of 6.0 gallons per hour.

2.c The VOC emissions from all coatings and cleanup materials from R002, and R001, R002 and Z001, combined, shall not exceed 25.0 tons per year, as a rolling, 12-month summation.

2.d The VOC content of coatings shall not exceed 6.39 pounds per gallon, as applied.

2.e Total emissions from emissions units R001, R002, and Z001, combined shall not exceed 9.9 tons per year of each single hazardous air pollutant (HAP), 24.9 tons per year of combined HAP, based upon a rolling, 12-month summation.

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.

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

3. The hours of operation of this emissions unit shall not exceed 72 hours per week.

4. The n-butanol content of the coatings shall not exceed 0.31 pound per gallon, as applied.

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

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

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

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

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

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

3. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup materials are not employed in this emissions unit:

a. the company identification for each coating or cleanup material employed;

b. documentation that photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) was not used;

c. the volatile organic compound (VOC) content of each coating, in lbs/gallon as applied;

d. the number of gallons of each coating employed minus the number of gallons of coating recovered for disposal;

e. the total VOC emissions from all coatings employed, in lbs/day, i.e., sum of (c) times (d);

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

g. the average hourly VOC emission rate for all coatings, i.e., (e)/(f), in lbs/hr.

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

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

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

   a. the number of gallons of each non-photochemically reactive cleanup material employed minus the number of gallons of cleanup material recovered for disposal;

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

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

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

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

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

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

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

   c. the single Hazardous Air Pollutant (HAP)[1] content for each HAP of each coating

and cleanup material, in pounds of individual HAP per gallon of coating, as applied;

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

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

f. the combined Hazardous Air Pollutants (HAPs)[1] content for all HAPs of each coating and cleanup material, in pounds of combined HAPs per gallon of coating, as applied;

g. the total combined HAPs emissions from all coatings and cleanup materials employed, in tons per month, i.e., the sum of (b) times (f) for each coating and cleanup material divided by 2000;

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

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

8. The permit to install for this emissions unit and emissions unit R001 were evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC) adjusted to reflect the operation hour limitation in this permit. The following summarizes the results of the modeling for the "worst case" pollutant(s) for emissions units R001 and R002, combined:

Compound: n-butanol

TLV (mg/m3): 60.63

Maximum Hourly Emission Rate (lbs/hr): 2.88

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 3,315

Adjusted MAGLC (ug/m3): 3,368

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

   c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee

shall obtain a final permit to install prior to the change.

10. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

    a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

    b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

    c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

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

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

    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 the pounds per hour limitation specified above, and the actual average VOC emissions for each such day;

    c. each day during which the VOC content of any coating exceeded the pounds per gallon limitation specified above and the actual VOC content of each such coatings employed;

    d. any exceedence of the annual VOC* emission limitation, as a rolling, 12-month summation, and the actual VOC emissions during such period;

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

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

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

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

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

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

3. The permittee shall also submit annual reports that summarize the following information:

a. the emissions of VOC from this emissions unit;

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

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

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

E. Testing Requirements

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

a. Emissions 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 C.2.f. based upon the record keeping specified in Section C.2.

b. Emissions 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 C.2.d based upon the record keeping specified in Section C.2.

c. Emissions Limitation:
38.3 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 C.3.g. based on the record keeping specified in Section C.3.

d. Emissions Limitation:
25.0 tons of VOC emissions per year from all coatings and cleanup material from R001 and from R001, R002 and Z001, combined

Applicable Compliance Method:
Compliance shall be determined by the value recorded in C.6.d and C.6.e based on the record keeping as specified in Section C.2, C.3 and C.6.

e. Emissions Limitation:
6.39 pounds of VOC per gallon coating, as applied.

Applicable Compliance Method:
Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular

coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

f. Emissions Limitations:
9.9 tons of each single HAP, based upon a rolling, 12-month summation for R001, R002, and Z001, combined.

Applicable Compliance Method:
Compliance shall be based on the record keeping as specified in Sections C.7.e.

g. Emissions Limitations:
24.9 tons of each total combined HAPs, based upon a rolling, 12-month summation for R001, R002, and Z001, combined.

Applicable Compliance Method:
Compliance shall be based on the record keeping as specified in Sections C.7.h.

F. Miscellaneous Requirements

1. The terms and conditions listed in this permit to install shall supercede all the air pollution control requirements for this emission unit contained in permit to install 02-18619 as issued on November 18, 2003.

2. In accordance with the provisions of OAC rule 3745-31-05(D), the following terms and conditions of this permit to install are federally enforceable: A-F, except B.3, B.4, C.4, C.5, C.8, C.9, C.10, D.2.e and D.2.h.