



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

7/26/2012

Mr. Robert Yoder
Indian Trail Woodworking
6661 S.R. 515
Dundee, OH 44624

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0238002002
Permit Number: P0110324
Permit Type: Initial Installation
County: Holmes

Certified Mail

Yes	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Holmes County Hub. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NEDO



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Indian Trail Woodworking is a manufacturer of wood based products and furniture. The facility currently has an 165 HP diesel engine (B002), a woodworking shop controlled by a cyclone and a 7,000 cfm baghouse in series, and associated wood waste load-out (P001), and two spray coating booths with filters (R001 and R002). In this permit, the facility proposed to install and operate an additional spray coating booth with a drying oven (R003).

3. Facility Emissions and Attainment Status:

The facility is located in Dundee, Holmes County, an area designated as "attainment" for all criteria pollutants, such as ozone, sulfur dioxide, PM_{2.5}, carbon monoxide, and lead. Indian Trail Woodworking will not be a "Major Source" for volatile organic compound (VOC) emissions, as well as any single hazardous air pollutant (HAP) and combined total HAPs, based upon the restrictions of VOC emissions from R001, R002, and R003 combined, as well as facility-wide emission limitations for each single HAP and combined total HAPs. Therefore, the requirements of Title V and Wood Furniture MACT, 40 CFR Part 63, subpart JJ, are not applicable to this facility.

4. Source Emissions:

This FEPTIO contains terms and conditions that restrict the VOC emissions from emissions units R001, R002, and R003 combined to 24.90 tons per year to avoid Title V requirements. The facility also proposed to limit facility-wide emissions of each single HAP to less than 9.90 tons per year, and combined total HAPs to less than 24.90 tons per year. Therefore, the Wood Furniture MACT, 40 CFR Part 63, subpart JJ will not be applicable to this facility. Indian Trail Woodworking is also required by this permit to track emissions, keep records, and submit reports.

5. Conclusion:

The emission limitations contained in this FEPTIO are adequate to provide federally enforceable limitations to ensure that the applicable MACT and Title V thresholds will not be exceeded.

6. Please provide additional notes or comments as necessary:

The facility will not be subject to the requirements of the Wood Furniture best available technology (BAT) found in OAC 3745-21-15 due to the limitation of VOC emissions to 24.90 tons per year from emissions units R001, R002, and R003.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC _{R001, R002, & R003}	24.90
Each single HAP _{Facility-wide}	9.90
Combined total HAPs _{Facility-wide}	24.90

PUBLIC NOTICE
7/26/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Indian Trail Woodworking

6661 St Rte 515,
Dundee, OH 44624

Holmes County

FACILITY DESC.: Nonupholstered Wood Household Furniture Manufacturing

PERMIT #: P0110324

PERMIT TYPE: Initial Installation

PERMIT DESC: Initial installation and operation permit for a semi-downdraft, manual spray coating operation for wood furniture with overspray filters. Parts are dried in a hot water-heated oven.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Tracy Gu, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Indian Trail Woodworking**

Facility ID:	0238002002
Permit Number:	P0110324
Permit Type:	Initial Installation
Issued:	7/26/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Indian Trail Woodworking

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Authorization

Facility ID: 0238002002

Application Number(s): A0044991

Permit Number: P0110324

Permit Description: Initial installation and operation permit for a semi-downdraft, manual spray coating operation for wood furniture with overspray filters. Parts are dried in a hot water-heated oven.

Permit Type: Initial Installation

Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 7/26/2012

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Indian Trail Woodworking
6661 St Rte 515
Dundee, OH 44624

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0110324

Permit Description: Initial installation and operation permit for a semi-downdraft, manual spray coating operation for wood furniture with overspray filters. Parts are dried in a hot water-heated oven.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	R003
Company Equipment ID:	Spray Booth #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions



1. R003, Spray Booth #1

Operations, Property and/or Equipment Description:

Semi-downdraft, manual spray coating operations for wood furniture with overspray filters. Parts are dried in a hot water heated oven.

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

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)f, d)(6), d)(7), d)(8), d)(9), and e)(3).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)d, b)(2)b, c)(2), c)(3), d)(11), e)(2), f)(1)a, f)(1)b, and f)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(C)	See c)(1), d)(1), d)(2), d)(2), d)(4), d)(5), and e)(1).
b.	OAC rule 3745-21-07(M)(2)	See b)(2)a.
c.	ORC 3704.03(T)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-17-11(C) and OAC rule 3745-31-05(D). See b)(2)c.
d.	OAC rule 3745-31-05(D)(1)(b)	See b)(2)b, c)(2), and c)(3).
e.	OAC rule 3745-31-05(E)	See c)(4).
f.	ORC 3704.03(F)(4)(c)	See d)(6), d)(7), d)(8), d)(9), and e)(3).



(2) Additional Terms and Conditions

- a. In accordance with OAC rule 3745-21-07(M)(3)(a), OAC rule 3745-21-07(M)(2) is not applicable because this emissions unit commenced installation after the effective date of this rule.
- b. The permittee proposed voluntary restrictions of facility-wide emissions not to exceed the following, based upon a rolling, 12-month summation, to avoid being subject to the requirements of Title V and Wood Furniture MACT, 40 CFR Part 63, Subpart JJ:
 - i. 9.90 tons per year of each individual hazardous air pollutant (HAP); and
 - ii. 24.90 tons per year of total combined HAPs.
- c. The facility is not subject to BAT requirements found in OAC rule 3745-21-15, because this facility has a restricted potential to emit for VOC of less than 25.0 tons per year for all wood furniture manufacturing operations combined.

c) Operational Restrictions

- (1) All exhaust from each emissions unit shall pass through the dry filters whenever the emissions unit is in operation.
- (2) The weight of organic material in solvent evaporated (solvent usage, minus the number of gallons recovered for disposal), which is equivalent to VOC emissions, shall be less than 24.9 tons during any rolling, 12-month summation from emissions units R001, R002, and R003, combined.
- (3) To ensure enforceability with the solvent usage restriction and emission limitations for each single HAP and combined total HAPs during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the solvent usage levels specified in the following table for emissions units R001, R002, and R003 combined:

Month	Maximum Allowable Solvent Usage (tons)	Maximum Allowable Each Single HAP Emissions (tons)	Maximum Allowable Combined Total HAPs Emissions (tons)
1	4.0	1.0	4.0
1 – 2	8.0	2.0	8.0
1 – 3	12.0	3.0	12.0
1 – 4	16.0	4.0	16.0
1 – 5	20.0	5.0	20.0
1 – 6	24.0	6.0	24.0



Month	Maximum Allowable Solvent Usage (tons)	Maximum Allowable Each Single HAP Emissions (tons)	Maximum Allowable Combined Total HAPs Emissions (tons)
1 – 7	24.9	7.0	24.9
1 – 8	24.9	8.0	24.9
1 – 9	24.9	9.0	24.9
1 – 10	24.9	9.9	24.9
1 - 11	24.9	9.9	24.9
1 - 12	24.9	9.9	24.9

After the first 12 calendar months of operation following issuance of this permit, compliance with the solvent usage restriction and emission limitations for each single HAP and combined total HAPs shall be based upon a rolling 12-month summation of the monthly solvent usage (emission) and HAP(s) emissions figures maintained in section d)(11) below.

- (4) The permittee proposed a voluntary restriction of a maximum 39.75 hours of coating time per every 168 hours for this emissions unit in order to meet the requirements of the Control of Toxic Emissions under Ohio Revised Code (ORC) 3704.03(F)(4)(d).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.
- (2) The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
- (3) The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

- (4) The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.
- (5) In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.
- (6) The FEPTIO application for this emissions unit, R003, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants or “worst case” toxic contaminant(s):

Toxic Contaminant: Toluene.

TLV (mg/m³): 75,36196

Maximum Hourly Emission Rate (lbs/hr): 2.673

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 7540.36

MAGLC (ug/m³): 7583.59

The permittee, having demonstrated that emissions of toluene, from emissions unit R003, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (7) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), 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 rule 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", ORC 3704.03(F), will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (8) 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 the "Toxic Air Contaminant Statute", 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 the "Toxic Air Contaminant Statute", 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 the "Toxic Air Contaminant Statute", 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.
- (9) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (10) The permittee shall collect and record the following information each month for this emissions unit:
- a. the company identification for each coating and cleanup material employed;
 - b. the VOC content of each coating and cleanup material, in pounds per gallon, as applied;

- c. the number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;
 - d. the total VOC emissions/solvent usage from all the coatings and cleanup materials employed, in pounds per month, i.e., sum of (b) times (c);
 - e. the each individual HAP content of each coating and cleanup material, in pounds per gallon, as applied;
 - f. the each individual HAP emissions from all the coatings and cleanup materials employed, in pounds per month, i.e., sum of (c) times (e);
 - g. the total combined HAPs content of each coating and cleanup material, in pounds per gallon, as applied; and
 - h. the total combined HAPs from all the coatings and cleanup materials employed, in pounds per month, i.e., sum of (c) times (g).
- (11) The permittee shall calculate and record the following information each month for emissions units R001, R002, and R003, combined:
- a. the total monthly VOC emissions/solvent usage from all the coatings and cleanup materials employed, in tons (calculated by summing the monthly VOC emissions for R001, R002, and R003);
 - b. the rolling, 12-month VOC emissions/solvent usage from emissions units R001, R002, and R003, combined, in tons;
 - c. the total monthly each individual HAP emissions from all the coatings and cleanup materials employed, in tons (calculated by summing the monthly each single HAP emissions for R001, R002, and R003);
 - d. the rolling, 12-month each individual HAP emissions from emissions units R001, R002, and R003 combined, in tons;
 - e. the monthly total combined HAPs emissions from all the coatings and cleanup materials employed, in tons (calculated by summing the monthly total combined HAPs emissions for R001, R002, and R003); and
 - f. the rolling, 12-month total combined HAPs emissions from emissions units R001, R002, and R003, combined, in tons.
- (12) Permittee shall keep an operating log of total coating hours for every 168 hours for this emissions unit.
- e) Reporting Requirements
- (1) The permittee shall notify the Director in writing of any daily record for each emissions unit that showing 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 shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. any exceedances of the first 12 calendar month(s) Maximum Allowable Solvent Usage and HAP(s) emissions chart as detailed in c)(3), and the actual solvent usage and HAP(s) emissions during each such period;
 - ii. all exceedances of the rolling, 12-month VOC emissions/solvent usage limitation of 24.90 tons from emissions units R001, R002, and R003, combined, and the actual VOC emissions from emissions units R001, R002, and R003, combined, during each such period;
 - iii. all exceedances of the rolling, 12-month each individual HAP emissions limitation of 9.90 tons facility-wide, and the actual individual HAP emissions facility-wide during each such period;
 - iv. all exceedances of the rolling, 12-month total combined HAPs emissions limitation of 24.90 tons facility-wide, and the actual total combined HAP emissions facility-wide during each such period.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Ohio EPA Northeast District Office).

- (3) The permittee shall include in the annual Permit Evaluation Report (PER) any exceedance of any deviation from a restriction on hours of operation, as established by the Director, in order to maintain any toxic air contaminant below its MAGLC. The permittee shall also include in the PER any changes made, during the calendar year, to a parameter or value entered into the dispersion model that was used to maintain compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

- (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.
 - (5) The permittee shall also submit annual reports that specify the total VOC emissions from emissions units R001, R002, and R003, combined, for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for the emissions units in the annual Fee Emission Report.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

VOC emissions/solvent usage shall not exceed 24.90 tons per rolling, 12-month period from all the coatings and cleanup materials for emissions units R001, R002, and R003, combined.

Applicable Compliance Method:

Compliance with shall be demonstrated based upon the record keeping requirements specified in d)(11).
 - b. Emission Limitation:

Facility-wide emissions of each individual HAP shall not exceed 9.90 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(11).
 - c. Emission Limitation:

Facility-wide emissions of total combined HAPs shall not exceed 24.90 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with shall be demonstrated based upon the record keeping requirements specified in d)(11).

d. Emission Limitation:

The permittee proposed a voluntary restriction of a maximum 39.75 hours of coating time per every 168 hours for this emissions unit in order to meet the requirements of the Control of Toxic Emissions under Ohio Revised Code (ORC) 3704.03(F)(4)(d).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(12).

- (2) 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.

g) Miscellaneous Requirements

- (1) None.