



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 14-05997

Fac ID: 1413010510

DATE: 12/18/2007

American Woodworking Company
Paige Willman
3200 Marshall Drive 3200 Marshall Drive
Amelia, OH 45102

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

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

Sincerely,

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

CC: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 12/18/2007
Effective Date: 12/18/2007**

FINAL PERMIT TO INSTALL 14-05997

Application Number: 14-05997
Facility ID: 1413010510
Permit Fee: **\$800**
Name of Facility: American Woodworking Company
Person to Contact: Paige Willman
Address: 3200 Marshall Drive 3200 Marshall Drive
Amelia, OH 45102

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3200 Marshall Drive
Amelia, Ohio**

Description of proposed emissions unit(s):
Permit to Install application for the installation of staining and coating operations on wood.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	29.93

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific 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 -(R001) - Preparation Building for Staining Operation

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Organic compound (OC) emissions from this emission unit shall not exceed 104.96 pounds per day from coatings only.</p> <p>OC emissions from this emission unit shall not exceed 20.36 tons per year including emissions from coating and cleanup operations.</p> <p>See terms and conditions A.2.a through A.2.e and B.1 through B.3 below.</p>
OAC rule 3745-21-07(G)	Exempt. See term and condition B.3.

2. Additional Terms and Conditions

- 2.a The OC content of each coating employed in this emissions unit shall not exceed 7.78 pounds per gallon, as applied.
- 2.b The OC content of each cleanup material employed in this emissions unit shall not exceed 6.59 pounds per gallon, as applied.
- 2.c Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of non-photochemically reactive materials, emissions limitations, OC content limitations and material usage limitations.
- 2.d The daily emission limitation outlined is based upon the emission unit's potential to emit (PTE). Therefore no daily records are required to demonstrate compliance with this limitation.
- 2.e All used, solvent soaked rags from the clean-up of this emissions unit shall be

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stored in containers with tightly fitting lids.

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B. Operational Restrictions

1. The maximum coating usage for this emissions unit shall not exceed 5840 gallons per year, as applied.
2. The maximum cleanup material usage for this emissions unit shall not exceed 365 gallons per year.
3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain a record of each liquid organic material employed in this emissions unit, indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month in this emissions unit:
 - a. The name and identification number of each coating;
 - b. The OC content of each coating, in pounds per gallon as applied;
 - c. The volume of each coating employed, in gallons;
 - d. The total volume of all coatings employed, in gallons;
 - e. The name and identification number of each cleanup material employed;
 - f. The OC content of each cleanup material, in pounds per gallon;
 - g. The volume of each cleanup material employed, in gallons;
 - h. The total volume of all cleanup materials employed, in gallons;
 - i. The total OC emissions from all coatings employed (b x c);
 - j. The total OC emissions from all cleanup materials employed (f x g); and

Emissions Unit ID: **R001**

- k. The total OC emissions from all coatings and cleanup materials employed, in pounds $[(b \times c) + (f \times g)]$.

These records shall be summarized at the end of the calendar year.

D. Reporting Requirements

1. The permittee shall submit annual reports which summarize the following for this emissions unit:
 - a. the total OC emissions from the coatings and cleanup materials employed in this emissions unit for the previous calendar year; and
 - b. the total number of gallons of coatings and cleanup materials employed in this emissions unit for the previous calendar year.

The reports shall be submitted by January 31 of each year.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying coatings and cleanup materials (i.e., for OC contents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

1. Formulation data or USEPA methods 24 or 24A shall be used to determine the VOC content for coatings and cleanup materials.

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2. Compliance with the emissions limitations in Section A and usage limitations in Section B of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:

OC emissions shall not exceed 104.96 pounds per day from coating usage only.

Issued: 12/18/2007Applicable Compliance Method:

The daily OC emission limitation from coatings use only shall be demonstrated by the following table as supplied in air permit application 14-05997 submitted on October 24, 2007:

<u>Coating</u>	<u>OC Content (lb/gal)</u>	<u>Daily Use (gal/day)</u>	<u>Daily Emissions (lbs/day)</u>
Sherwood BAC	5.08	5	25.40
Brown Perfect	6.85	5	34.25
Seal 550 LH	7.78	5	38.90
Global Resistovar	6.41	1	6.41
Total		16	104.96

b. Emissions Limitation:

OC emissions shall not exceed 20.36 tons per year including coatings and cleanup materials.

Applicable Compliance Method:

The annual OC emissions limitation from coating and cleanup materials use was calculated from the following table as supplied in air permit application 14-05997 submitted on October 24, 2007:

<u>Coatings/Cleanup</u>	<u>OC Content (lb/gal)</u>	<u>Annual Use (gal/year)</u>	<u>Annual Emissions (Tons/Yr)</u>
Sherwood BAC	5.08	1825	4.64
Brown Perfect	6.85	1825	6.25
Seal 550 LH	7.78	1825	7.10
Global Resistovar	6.41	365	1.17
Lacquer Thinner	6.59	365	1.20
Total			20.36

Compliance shall be based upon the record keeping requirements as specified in term and condition C.2.

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3. Compliance with the usage limitations specified in terms and conditions B.1 and B.2 shall be based upon the recordkeeping requirements as specified in term and condition C.2.
4. Compliance with the prohibition of the use of photochemically reactive material in this emissions unit shall be based on the record keeping requirements specified in term and condition C.1.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.

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 -(R002) - Finish Building with Paint Spray Booth

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions from this emission unit shall not exceed 45.86 pounds per day from coatings only. OC emissions from this emission unit shall not exceed 9.57 tons per year including emissions from coating and cleanup operations. See terms and conditions A.2.a through A.2.e and B.1 through B.3 below.
OAC rule 3745-21-07(G)	Exempt. See term and condition B.3.

2. Additional Terms and Conditions

- 2.a The OC content of each coating employed in this emissions unit shall not exceed 7.89 pounds per gallon, as applied.
- 2.b The OC content of each cleanup material employed in this emissions unit shall not exceed 6.59 pounds per gallon, as applied.
- 2.c Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of non-photochemically reactive materials, emissions limitations, OC content limitations and material usage limitations.
- 2.d The daily emission limitation outlined is based upon the emission unit's potential to emit (PTE). Therefore no daily records are required to demonstrate compliance with this limitation.
- 2.e All used, solvent soaked rags from the clean-up of this emissions unit shall be stored in containers with tightly fitting lids.

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B. Operational Restrictions

1. The maximum coating usage for this emissions unit shall not exceed 2190 gallons per year, as applied.
2. The maximum cleanup material usage for this emissions unit shall not exceed 365 gallons per year.
3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain a record of each liquid organic material employed in this emissions unit, indicating whether or not the liquid organic material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month in this emissions unit:
 - a. The name and identification number of each coating;
 - b. The OC content of each coating, in pounds per gallon as applied;
 - c. The volume of each coating employed, in gallons;
 - d. The total volume of all coatings employed, in gallons;
 - e. The name and identification number of each cleanup material employed;
 - f. The OC content of each cleanup material, in pounds per gallon;
 - g. The volume of each cleanup material employed, in gallons;
 - h. The total volume of all cleanup materials employed, in gallons;
 - i. The total OC emissions from all coatings employed (b x c);
 - j. The total OC emissions from all cleanup materials employed (f x g); and

American Woodworking Company

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Emissions Unit ID: **R002**

- k. The total OC emissions from all coatings and cleanup materials employed, in pounds $[(b \times c) + (f \times g)]$.

These records shall be summarized at the end of the calendar year.

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D. Reporting Requirements

1. The permittee shall submit annual reports which summarize the following for this emissions unit:
 - a. the total OC emissions from the coatings and cleanup materials employed in this emissions unit for the previous calendar year; and
 - b. the total number of gallons of coatings and cleanup materials employed in this emissions unit for the previous calendar year.

The reports shall be submitted by January 31 of each year.

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record showing the use of noncomplying coatings and cleanup materials (i.e., for OC contents) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit unless otherwise specified.

E. Testing Requirements

1. Formulation data or USEPA methods 24 or 24A shall be used to determine the VOC content for coatings and cleanup materials.
2. Compliance with the emission limitations in Section A and usage limitations in Section B of these terms and conditions shall be determined in accordance with the following method(s):

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a. Emissions Limitation:

OC emissions shall not exceed 45.86 pounds per day from coating usage only.

Issued: 12/18/2007Applicable Compliance Method:

The daily OC emission limitation from coatings use only shall be demonstrated by the following table as supplied in air permit application 14-05997 submitted on October 24, 2007:

<u>Coatings</u>	<u>OC Content (lb/gal)</u>	<u>Daily Usage (gal/day)</u>	<u>Daily Emissions (lbs/day)</u>
Global Ultra SS CV	7.89	5	39.45
Global Resistovar	6.41	1	6.41
Total		6	45.86

b. Emissions Limitation:

OC emissions shall not exceed 9.57 tons per year including coatings and cleanup materials.

Applicable Compliance Method:

The annual OC emissions limitation from coating and cleanup materials use was calculated from the following table as supplied in air permit application 14-05997 submitted on October 24, 2007:

<u>Coatings/Cleanup</u>	<u>OC Content (lb/gal)</u>	<u>Annual Usage (gal/year)</u>	<u>Annual Emissions (Tons/Yr)</u>
Global Ultra SS CV	7.89	1825	7.20
Global Resistovar	6.41	365	1.17
Lacquer Thinner	6.59	365	1.20
Total			9.57

Compliance shall be based upon the record keeping requirements as specified in term and condition C.2.

3. Compliance with the usage limitations specified in terms and conditions B.1 and B.2 shall be based upon the recordkeeping requirements as specified in term and condition C.2.

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4. Compliance with the prohibition of the use of photochemically reactive material in this emissions unit shall be based on the record keeping requirements specified in term and condition C.1.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.