Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

10/1/2012

KENNETH D MAIBACH
SWISS WOODCRAFT INC
15 INDUSTRIAL ST
RITTMAN, OH 44270

No	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
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0285020311
Permit Number: P0110614
Permit Type: OAC Chapter 3745-31 Modification
County: Wayne

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director 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, made payable to “Ohio Treasurer Josh Mandel," 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

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page,www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: Ohio EPA-NEDO

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
SWISS WOODCRAFT INC

Facility ID:	0285020311
Permit Number:	P0110614
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	10/1/2012
Effective:	10/1/2012
Expiration:	8/9/2017

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
SWISS WOODCRAFT INC

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Authorization

Facility ID: 0285020311
Application Number(s): A0044212
Permit Number: P0110614
Permit Description: Chapter 31 modification for manual spray booth (R001) and in-line spray booth (R002) to allow for higher VOC content coatings.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $400.00
Issue Date: 10/1/2012
Effective Date: 10/1/2012
Expiration Date: 8/9/2017
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

SWISS WOODCRAFT INC
15 INDUSTRIAL ST
RITTMAN, OH 44270

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: P0110614
Permit Description: Chapter 31 modification for manual spray booth (R001) and in-line spray booth (R002) to allow for higher VOC content coatings.

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

Emissions Unit ID:	**R001**
Company Equipment ID:	manual booth
Superseded Permit Number:	02-21422
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R002**
Company Equipment ID:	in line booth
Superseded Permit Number:	02-21422
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 takenby 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 submitting[1] 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.

[1]Permittees 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. R001, manual booth

Operations, Property and/or Equipment Description:

Manual spray booth with one air-assisted spray gun to coat wood parts.

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. d)(8), d)(9), d)(10), d)(16), e)(1) and e)(2)

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

a. None.

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 3745-31-05(A)(3)	The total volatile organic compound (VOC) emissions shall not exceed 25.0 tons per year from coatings and clean up materials combined from R001, R002 and R003, based on a rolling, 12-month summation. The Hazardous Air Pollutant (HAP) emissions shall not exceed 9.9 tons per year for any individual HAP or 24.9 tons per year for total combined HAP from emissions units R001, R002 and R003, combined, based on a rolling, 12-month summation.
b.	OAC rule 3745-17-011(C)	See b)(2)a, c)(2) and d(9) through d)(13).

(1) Additional Terms and Conditions

a. On February 1, 2008, OAC rule 3745-17-11, was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves, paragraph (C) of OAC rule 3745-17-11, as a revision to the Ohio State Implementation Plan (SIP)

b. The total emissions from emissions units, R001, R002 and R003, combined, shall not exceed 25.0 tons per year of VOC, based upon a rolling, 12-month summation.

c. The total emissions from emissions units, R001, R002 and R003, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for total combined HAP, based upon a rolling, 12-month summation.

d. The VOC content of the stain coating shall not exceed 7.89 pounds per gallon, as applied, while the VOC content of the finish coating shall not exceed 5.66 pounds per gallon, as applied.

e. In order to demonstrate compliance with the “Toxic Air Contaminant Statute”, the content of any individual HAP in any coating or cleanup material shall not exceed 36 percent, by weight, of the VOC portion of the coating or clean up material, as applied. The content of the total combined HAPs in any coating or cleanup material shall not exceed 96 percent, by weight, of the VOC portion of the coating or clean up material, as applied.

c) Operational Restrictions

(1) The permittee shall install, operate, and maintain a dry filtration system for the control of particulate emissions whenever emissions units R001, R002 and R003 are in operation and shall maintain the dry particulate filter in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) In the event the particulate filter system is not operating in accordance with the manufacturer’s recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(3) The permittee has proposed a voluntary restriction of a maximum 82.5 operating hours per week per emissions unit in order to meet the requirements of the control of toxic emissions under ORC 3704.03(F)(4)(d).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain weekly records of the total number of hours of operation for this emissions unit.

(2) The permittee shall maintain daily records of the VOC content, in pounds per gallon as applied, for both the stain and finish coatings.

(3) The permittee shall maintain daily records of the xylene, ethyl benzene, and toluene content of each coating, as applied, in pounds/gallon.

(4) The permittee shall collect and record the following information each day for the coating operations:

a. the name and identification number of each coating applied or cleanup material employed;

b. the VOC content (excluding water and exempt solvents) of each coating as applied, in pounds VOC/gallon of coating applied;

c. the number of gallons of each coating applied or cleanup material employed, minus the number of gallons of coating and/or cleanup material employed;

d. the VOC emissions from each coating applied, for each coating, in pounds of VOC/coating;

e. the daily VOC emissions from all the coatings applied, i.e., the sum of d)(4)d for all coatings, in pounds of VOC/day;

f. the total number of gallons of all coatings applied;

g. the number of hours of operation; and

h. the total VOC emissions from all coatings applied and cleanup materials employed, in pounds/day.

(5) The permittee shall collect and record the following information for each month for this emissions unit:

a. anytime that the content of any individual HAP in any coating or cleanup material exceeds 36 percent, by weight, of the VOC portion of the coating or clean up material, as applied; and

b. anytime that the content of the total combined HAPs in any coating or clean up material exceeds 96 percent, by weight, of the VOC portion of the coating or clean up material, as applied.

(6) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year, plus the sum of the monthly emissions from cleanup materials for the calendar year per emissions unit.

(7) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year, plus the sum of the monthly emissions from cleanup materials for the calendar year from R001, R002 and R003, combined.

(8) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), R001, R002 and R003, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) 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 at over one ton per year 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(s), (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., 13.75 hours per day and 6 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 (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

i. Toxic Contaminant: Xylene

TLV (mg/m3): 434.19

Maximum Hourly Emission Rate (lbs/hr): 20.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 10684

MAGLC (ug/m3): 210,200

ii. Toxic Contaminant: Ethyl Benzene

TLV (mg/m3): 434.19

Maximum Hourly Emission Rate (lbs/hr): 5.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2635

MAGLC (ug/m3): 210,200

iii. Toxic Contaminant: Toluene

TLV (mg/m3): 75.36

Maximum Hourly Emission Rate (lbs/hr): 7.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2922

MAGLC (ug/m3): 36,539

The permittee, has demonstrated that emissions of Xylene, Ethyl Benzene, and Toluene from emissions unit(s) R001, R002, and R003 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); 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).

(9) 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:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

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

(10) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

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.

(11) The permittee shall conduct periodic inspections of the dry filtration system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, and/or operating manual and/or in accordance with any documented modifications deemed necessary by the permittee. The inspection frequency shall be based upon the recommendation of the manufacturer.

(12) In addition to the recommended periodic inspections, the permittee shall conduct a comprehensive inspection of the dry filtration system at least once per year while the coating operations are shut down and shall perform any needed maintenance and repair.

(13) The permittee shall maintain the following information for the dry filtration system:

a. documentation of the manufacturer's recommendations, instructions, or operating manual, along with documentation of any modifications deemed necessary by the permittee;

b. any period(s) of time when the dry filtration system was not in service when the emissions unit was in operation;

c. any period(s) of time (during coating operations) when the dry filtration system was not operating according to the manufacturer's recommendations and/or according to documented modifications to the manufacturer's recommendations deemed necessary by the permittee; and

d. records for each inspection (periodic and annual) of the dry filtration system to include the following information:

i. the date of the inspection;

ii. a description of each/any problem identified and the date it was corrected;

iii. a description of any maintenance and repairs performed and the date; and

iv. the name of person who performed the inspection.

(14) The manufacturer's operation manual, along with any documented modifications determined necessary by the permittee, shall be maintained at the facility at all times. Records of malfunction, maintenance, and inspections of the dry filtration system shall be maintained for a period of not less than five years from the date of record and shall be made available to the Ohio EPA upon request.

(15) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(16) 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.

(17) The permittee shall collect and record the following information each month for emissions units R001, R002 and R003, combined:

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

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

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

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

e. the rolling, 12-month summation of the emissions of each individual HAP from emissions units R001, R002 and R003, combined, for the previous 12-month period, i.e., the summation of (d) in tons per rolling, 12-month period;

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

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

h. the rolling, 12-month summation of the emissions of total combined HAPs from emissions units R001, R002 and R003, combined, for the previous 12-month period, i.e., the summation of (g) in tons per rolling, 12-month period.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation reports, to the appropriate Ohio EPA District Office or local air agency, documenting any exceedance of the daily limitation on toxic air emissions or any deviation from a restriction on the process or hours of operation, as established by the Director in order to maintain any toxic air contaminant below its MAGLC. The permittee shall also report any changes made, during the calendar quarter, 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. These quarterly reports shall be submitted by April 30, July 31, October 31 and January 31, and shall cover the records for the previous calendar quarters.

(2) The permittee shall include in the annual Permit Evaluation Report (PER) any exceedance of the daily limitation on toxic air emissions or any deviation from a restriction on the process or 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.

(3) The permittee shall submit an annual certification of compliance status to the Ohio EPA. The report must be completed electronically and submitted via the Ohio EPA "e-Business Center: Air Services" by the due date identified in the Authorization section of this permit. The certificate of compliance shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. Unless other arrangements have been approved by the Director, all notification and reports shall be submitted through the Ohio EPA's "e-Business Center: Air Services" online web portal. The annual compliance reports shall include:

a. a statement as to whether the coating operation was in compliance with each of the listed applicable rules and requirements, including the limitation on the VOC content of each coating applied; and whether the records of the coating and cleanup material usage demonstrated that annual emissions, as calculated in d)(3), did not exceed the ton per year VOC limit;

b. identification of any period of time (date and number of hours) when the dry filtration system was not in service or was not operating in accordance with the manufacturer's or permittee's documented instructions during coating operations;

c. identification of any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the procedure in c)(2), including any additional HAPs or an increased concentration of HAPs from new coatings or cleanup materials and/or an increase in material usage; and

d. reports that specify the total organic compound and HAP emissions from this emissions unit for the previous calendar year.

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. <u>Emission Limitation</u>:

The total VOC emissions shall not exceed 25.0 tons per year from coatings and clean up materials combined from R001, R002 and R003, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated from the value recorded in d)(5)a and d)(5)b, based on the record keeping requirements specified in d)(4), d)(6) and d)(7).

b. Emission Limitations:

The HAP emissions shall not exceed 9.9 tons per year for any individual HAP or 24.9 tons per year for total combined HAP from emissions units R001, R002 and R003, combined, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in d)(17).

c. Emission Limitation:

The VOC content of the stain coating shall not exceed 7.89 pounds per gallon, as applied.

Applicable Compliance Method:

Any determination of VOC content, solids content, or density of coating material shall be based on the coating materials 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, 40CFR, 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 notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides an alternative analytical procedure or an alternative precision statement for Method 24 and/or Method 24A.

d. Emission Limitation:

The VOC content of the finish coating shall not exceed 5.66 pounds per gallon, as applied.

Applicable Compliance Method:

Any determination of VOC content, solids content, or density of coating material shall be based on the coating materials 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, 40CFR,

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 notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides an alternative analytical procedure or an alternative precision statement for Method 24 and/or Method 24A.

g) Miscellaneous Requirements

(1) None.

2. R002, in line booth

Operations, Property and/or Equipment Description:

In line spray booth with six spray guns to coat wood parts.

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. d)(8), d)(9), d)(10), d)(16), e)(1) and e)(2)

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

a. None.

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 3745-31-05(A)(3)	The total volatile organic compound (VOC) emissions shall not exceed 25.0 tons per year from coatings and clean up materials combined from R001, R002 and R003, based on a rolling, 12-month summation. The Hazardous Air Pollutant (HAP) emissions shall not exceed 9.9 tons per year for any individual HAP or 24.9 tons per year for total combined HAP from emissions units R001, R002 and R003, combined, based on a rolling, 12-month summation.
b.	OAC rule 3745-17-011(C)	See b)(2)a, c)(2) and d(9) through d)(13).

(2) Additional Terms and Conditions

a. On February 1, 2008, OAC rule 3745-17-11, was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves, paragraph (C) of OAC rule 3745-17-11, as a revision to the Ohio State Implementation Plan (SIP)

b. The total emissions from emissions units, R001, R002 and R003, combined, shall not exceed 25.0 tons per year of VOC, based upon a rolling, 12-month summation.

c. The total emissions from emissions units, R001, R002 and R003, combined, shall not exceed 9.9 tons per year for any individual HAP and 24.9 tons per year for total combined HAP, based upon a rolling, 12-month summation.

d. The VOC content of the stain coating shall not exceed 7.89 pounds per gallon, as applied, while the VOC content of the finish coating shall not exceed 5.66 pounds per gallon, as applied.

e. In order to demonstrate compliance with the “Toxic Air Contaminant Statute”, the content of any individual HAP in any coating or cleanup material shall not exceed 36 percent, by weight, of the VOC portion of the coating or clean up material, as applied. The content of the total combined HAPs in any coating or cleanup material shall not exceed 96 percent, by weight, of the VOC portion of the coating or clean up material, as applied.

c) Operational Restrictions

(1) The permittee shall install, operate, and maintain a dry filtration system for the control of particulate emissions whenever emissions units R001, R002 and R003 are in operation and shall maintain the dry particulate filter in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(2) In the event the particulate filter system is not operating in accordance with the manufacturer’s recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(3) The permittee has proposed a voluntary restriction of a maximum 82.5 operating hours per week per emissions unit in order to meet the requirements of the control of toxic emissions under ORC 3704.03(F)(4)(d).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain weekly records of the total number of hours of operation for this emissions unit.

(2) The permittee shall maintain daily records of the VOC content, in pounds per gallon as applied, for both the stain and finish coatings.

(3) The permittee shall maintain daily records of the xylene, ethyl benzene, and toluene content of each coating, as applied, in pounds/gallon.

(4) The permittee shall collect and record the following information each day for the coating operations:

a. the name and identification number of each coating applied or cleanup material employed;

b. the VOC content (excluding water and exempt solvents) of each coating as applied, in pounds VOC/gallon of coating applied;

c. the number of gallons of each coating applied or cleanup material employed, minus the number of gallons of coating and/or cleanup material employed;

d. the VOC emissions from each coating applied, for each coating, in pounds of VOC/coating;

e. the daily VOC emissions from all the coatings applied, i.e., the sum of d)(4)d for all coatings, in pounds of VOC/day;

f. the total number of gallons of all coatings applied;

g. the number of hours of operation; and

h. the total VOC emissions from all coatings applied and cleanup materials employed, in pounds/day.

(5) The permittee shall collect and record the following information for each month for this emissions unit:

a. anytime that the content of any individual HAP in any coating or cleanup material exceeds 36 percent, by weight, of the VOC portion of the coating or clean up material, as applied; and

b. anytime that the content of the total combined HAPs in any coating or clean up material exceeds 96 percent, by weight, of the VOC portion of the coating or clean up material, as applied.

(6) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year, plus the sum of the monthly emissions from cleanup materials for the calendar year per emissions unit.

(7) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year, plus the sum of the monthly emissions from cleanup materials for the calendar year from R001, R002 and R003, combined.

(8) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), R001, R002 and R003, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) 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 at over one ton per year 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(s), (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., 13.75 hours per day and 6 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 (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

i. Toxic Contaminant: Xylene

TLV (mg/m3): 434.19

Maximum Hourly Emission Rate (lbs/hr): 20.1

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 10684

MAGLC (ug/m3): 210,200

ii. Toxic Contaminant: Ethyl Benzene

TLV (mg/m3): 434.19

Maximum Hourly Emission Rate (lbs/hr): 5.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2635

MAGLC (ug/m3): 210,200

iii. Toxic Contaminant: Toluene

TLV (mg/m3): 75.36

Maximum Hourly Emission Rate (lbs/hr): 7.9

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2922

MAGLC (ug/m3): 36,539

The permittee, has demonstrated that emissions of Xylene, Ethyl Benzene, and Toluene from emissions unit(s) R001, R002, and R003 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); 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).

(9) 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:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

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

(10) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

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.

(11) The permittee shall conduct periodic inspections of the dry filtration system to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, and/or operating manual and/or in accordance with any documented modifications deemed necessary by the permittee. The inspection frequency shall be based upon the recommendation of the manufacturer.

(12) In addition to the recommended periodic inspections, the permittee shall conduct a comprehensive inspection of the dry filtration system at least once per year while the coating operations are shut down and shall perform any needed maintenance and repair.

(13) The permittee shall maintain the following information for the dry filtration system:

a. documentation of the manufacturer's recommendations, instructions, or operating manual, along with documentation of any modifications deemed necessary by the permittee;

b. any period(s) of time when the dry filtration system was not in service when the emissions unit was in operation;

c. any period(s) of time (during coating operations) when the dry filtration system was not operating according to the manufacturer's recommendations and/or according to documented modifications to the manufacturer's recommendations deemed necessary by the permittee; and

d. records for each inspection (periodic and annual) of the dry filtration system to include the following information:

i. the date of the inspection;

ii. a description of each/any problem identified and the date it was corrected;

iii. a description of any maintenance and repairs performed and the date; and

iv. the name of person who performed the inspection.

(14) The manufacturer's operation manual, along with any documented modifications determined necessary by the permittee, shall be maintained at the facility at all times. Records of malfunction, maintenance, and inspections of the dry filtration system shall be maintained for a period of not less than five years from the date of record and shall be made available to the Ohio EPA upon request.

(15) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(16) 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.

(17) The permittee shall collect and record the following information each month for emissions units R001, R002 and R003, combined:

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

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

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

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

e. the rolling, 12-month summation of the emissions of each individual HAP from emissions units R001, R002 and R003, combined, for the previous 12-month period, i.e., the summation of (d) in tons per rolling, 12-month period;

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

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

h. the rolling, 12-month summation of the emissions of total combined HAPs from emissions units R001, R002 and R003, combined, for the previous 12-month period, i.e., the summation of (g) in tons per rolling, 12-month period.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation reports, to the appropriate Ohio EPA District Office or local air agency, documenting any exceedance of the daily limitation on toxic air emissions or any deviation from a restriction on the process or hours of operation, as established by the Director in order to maintain any toxic air contaminant below its MAGLC. The permittee shall also report any changes made, during the calendar quarter, 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. These quarterly reports shall be submitted by April 30, July 31, October 31 and January 31, and shall cover the records for the previous calendar quarters.

(2) The permittee shall include in the annual Permit Evaluation Report (PER) any exceedance of the daily limitation on toxic air emissions or any deviation from a restriction on the process or 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.

(3) The permittee shall submit an annual certification of compliance status to the Ohio EPA. The report must be completed electronically and submitted via the Ohio EPA "e-Business Center: Air Services" by the due date identified in the Authorization section of this permit. The certificate of compliance shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. Unless other arrangements have been approved by the Director, all notification and reports shall be submitted through the Ohio EPA's "e-Business Center: Air Services" online web portal. The annual compliance reports shall include:

a. a statement as to whether the coating operation was in compliance with each of the listed applicable rules and requirements, including the limitation on the VOC content of each coating applied; and whether the records of the coating and cleanup material usage demonstrated that annual emissions, as calculated in d)(3), did not exceed the ton per year VOC limit;

b. identification of any period of time (date and number of hours) when the dry filtration system was not in service or was not operating in accordance with the manufacturer's or permittee's documented instructions during coating operations;

c. identification of any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the procedure in c)(2), including any additional HAPs or an increased concentration of HAPs from new coatings or cleanup materials and/or an increase in material usage; and

d. reports that specify the total organic compound and HAP emissions from this emissions unit for the previous calendar year.

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. <u>Emission Limitation</u>:

The total VOC emissions shall not exceed 25.0 tons per year from coatings and clean up materials combined from R001, R002 and R003, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated from the value recorded in d)(5)a and d)(5)b, based on the record keeping requirements specified in d)(4), d)(6) and d)(7).

b. Emission Limitations:

The HAP emissions shall not exceed 9.9 tons per year for any individual HAP or 24.9 tons per year for total combined HAP from emissions units R001, R002 and R003, combined, based on a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in d)(17).

c. Emission Limitation:

The VOC content of the stain coating shall not exceed 7.89 pounds per gallon, as applied.

Applicable Compliance Method:

Any determination of VOC content, solids content, or density of coating material shall be based on the coating materials 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, 40CFR, 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 notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides an alternative analytical procedure or an alternative precision statement for Method 24 and/or Method 24A.

d. Emission Limitation:

The VOC content of the finish coating shall not exceed 5.66 pounds per gallon, as applied.

Applicable Compliance Method:

Any determination of VOC content, solids content, or density of coating material shall be based on the coating materials 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, 40CFR,

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 notify the Administrator of the U.S. EPA and shall use formulation data for that coating or ink to demonstrate compliance until the U.S. EPA provides an alternative analytical procedure or an alternative precision statement for Method 24 and/or Method 24A.

g) Miscellaneous Requirements

(1) None.