☐ **Synthetic Minor Determination and/or** ☐ **Netting Determination**
Permit To Install **03-17021**

A. Source Description

Norwalk Furniture, Corp. has proposed the modification of 3 stain and varnish spray booths which employ non-photochemically reactive coatings.

B. Facility Emissions and Attainment Status

The facility is potentially a major source for MACT and Title V for HAP emissions. Huron county is attainment for all criteria pollutants.

C. Source Emissions

Potential Emissions: Without any restrictions, the facility has a potential to emit greater than 10 tons/yr of any individual HAP and 25 tons/yr of any combination of HAPs. The facility does not currently have a potential to emit is excess of 100 tons/yr of volatile organic compounds.

Restricting Potential Emissions: The facility has requested a gallon usage restriction of 10,100 gallons/rolling 12-month period from coating operations from emission units R001-R003 and a OC content restriction of 6.55 lbs/gallon to reduce OC emissions to avoid future Title V permitting (a restriction on OC effectively restricts VOC).

The facility has also requested annual emissions limitations of less than 10 tons/yr for any individual HAP and less than 25 tons/yr from any combination of HAPs to reduce their emissions to below MACT and Title V thresholds.

D. Conclusion

With the coating gallon usage restrictions and OC content restrictions, the OC emissions will be below the Title V thresholds. With the annual HAP emissions limitations, the facility will be below the single and aggregate HAP MACT and Title V thresholds. Therefore, the facility will not be subject to MACT or Title V.

State of Ohio Environmental Protection Agency

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

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

Application No: 03-17021
Fac ID: 0339020083

DATE: 12/6/2005

Norwalk Furniture Corporation
Ron Mahl
100 Furniture Parkway
Norwalk, OH 448579500

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

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$600** will be due. Please do not submit any payment now.

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

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **NWDO** MI

HURON COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **03-17021** FOR AN AIR CONTAMINANT SOURCE FOR
Norwalk Furniture Corporation

On 12/6/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Norwalk Furniture Corporation**, located at **100 Furniture Parkway, Norwalk**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-17021:

Modification to (3) wood coating operations.

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

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 [(419)352-8461]

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install | **Issue Date: To be entered upon final issuance**
Terms and Conditions | **Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 03-17021

Application Number:	03-17021
Facility ID:	0339020083
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Norwalk Furniture Corporation
Person to Contact:	Ron Mahl
Address:	100 Furniture Parkway Norwalk, OH 448579500

Location of proposed air contaminant source(s) [emissions unit(s)]:
100 Furniture Parkway
Norwalk, Ohio

Description of proposed emissions unit(s):
Modification to (3) wood coating operations.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
OC	51.47
Individual HAP	<10.00
Aggregate HAPs	<25.00

Emissions Unit ID: **R001**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Stain & Varnish Spray Booth #1 (Modification to PTI 03-13929, issued on April 15, 2003 to allow for increase in emissions and establish federally enforceable emission limitations)	OAC rule 3745-31-05 (A) (3)	5.63 lbs organic compounds (OC)/hr from coating operations (See A.2.d) 1021.00 lbs OC/month & 6.13 tons OC/yr from cleanup operations See A.2.a
	OAC rule 3745-31-05 (C)	33.08 tons OC per rolling 12-month period from coating operations from R001-R003 combined (See A.2.b, B.1, and B.2)
	OAC rule 3745-21-07 (G) (2)	Annual hazardous air pollutant (HAP)* emissions from emissions unit K001-K012 & R001-R003 shall not exceed 10 tons per rolling 12-month period for and individual HAP and 25 tons per rolling 12-month period for all HAPs combined (see A.2.c) See B.3.

Emissions Unit ID: **R001**

*Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (C).

2.b The emissions of OC from emissions units K001 through K012 and R001-R003 combined shall not exceed 33.08 tons per rolling 12-month period from coating operations based on coating usage restrictions (See B.1. and B.2.). For purposes of federal enforceability, emission limitations of OC effectively restrict volatile organic compound (VOC) emissions. Federally enforceable OC limitations are being established for purposes of limiting potential to emit.

2.c Annual HAP emissions from emissions units K001 through K012 & R001 through R003 shall not exceed 10 tons per rolling 12-month period for an individual HAP and 25 tons per rolling 12-month period for any combination of HAPs.

Rolling emissions limitations have been established in Permit to Install (PTI) #03-13929, issued on April 15, 2003, and, as such, rolling HAP emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

2.d The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 0.86 gallons per hour and a maximum OC content of 6.55 pounds per gallon.

B. Operational Restrictions

1. The maximum annual coating usage for emissions unit R001 through R003 combined shall not exceed 10,1000 gallons per year, based on a rolling, 12-month summation of the coating usage. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit the permittee shall not exceed the levels specified in the following table:

Month(s)	Maximum Allowable Coating Usage (gallons)
1	2525
1-2	3213
1-3	3901
1-4	4589
1-5	5277
1-6	5965
1-7	6653
1-8	7341
1-9	8029
1-10	8717
1-11	9405
1-12	10,100

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling 12-month summation of coating usage.

2. The OC content for all coatings employed in this emissions unit shall not exceed 6.55 lbs/gallon, as applied.

3. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for all coatings employed in this emissions unit:

   a. the name and identification number of each coating employed;

   b. the volume, in gallons, of each coating employed;

   c. the total volume, in gallons, of all coatings employed (sum of C.1.b.);

   d. documentation of whether or not each coating material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

   e. the OC content of each coating employed, in pounds per gallon, as applied;

f. the OC emissions from each coating material employed, in pounds (C.1.b. x C.1.e), for each coating employed; and

g. the total OC emissions from all coatings employed, in pounds (sum of C.1.f.).

2. In conjunction with the record keeping requirements specified in C.1. above, the permittee shall also record the following each month for emissions unit R001 through R003 combined:

a. for the first 12 months of operation, the cumulative monthly emission rate of OC, in tons per month;

b. beginning the first month after the 12 calendar months of operation, the rolling 12-month summation of the emission rate for OC, in tons;

c. during the first 12 calendar months of operation, the cumulative coating usage, in gallons; and

d. beginning the first month after the first 12 calendar months of operation, the rolling, 12-month summation of the coating usage, in gallons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

3. The permittee shall collect and record the following each month for cleanup operations:

a. the name and identification of each cleanup material employed;

b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

c. the OC content of each cleanup material employed, in pounds per gallon;

d. the number of gallons of each cleanup material employed;

e. the OC emissions from each cleanup material employed (C.3.c x C.3.d);

f. the total OC emissions from all cleanup materials employed (summation of C.3.e), in pounds or tons; and

g. The annual year to date OC emissions from cleanup operations, in tons per year (summation of C.3.f)

4. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K001 through K012 and R001 through R003 combined:

   a. the company identification of each coating and cleanup material employed;

   b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;

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

   d. the total emission rate for each HAP from all coatings and cleanup materials employed, [summation of each HAP emission rate (C.4.b x C.4.c) for each individual coating and cleanup material], in lbs/month;

   e. the total HAP emission rate for the combination of all HAPs from all coatings, and cleanup materials employed, (sum of C.4.d for all HAPs), in lbs/month; and

   f. the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

5. The permit to install for emissions units R001 through R003 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: 2-butoxy ethanol

   TLV (mg/m3): 96.66

   Maximum Hourly Emission Rate (lbs/hr): 0.96

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 262

MAGLC (ug/m3): 2301

Pollutant: 2-methyl 1-propanol

TLV (mg/m3): 151.575

Maximum Hourly Emission Rate (lbs/hr): 1.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 319.18

MAGLC (ug/m3): 3609

Pollutant: Diacetone Alcohol

TLV (mg/m3): 188.405

Maximum Hourly Emission Rate (lbs/hr): 3.12

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 851.14

MAGLC (ug/m3): 4486

Pollutant: Toluene

TLV (mg/m3): 188.405

Maximum Hourly Emission Rate (lbs/hr): 2.36

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 643.22

MAGLC (ug/m3): 4486

Pollutant: Methanol

TLV (mg/m3): 262.086

Maximum Hourly Emission Rate (lbs/hr): 16.89

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4607.6

MAGLC (ug/m3): 6240

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

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

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

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

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of a photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:

   a. any exceedances of the 33.08 tons OC per rolling, 12-month period from coating operations for R001 through R003 combined;

   b. any exceedance of the maximum allowable coating OC content specified in B.2.;

   c. any exceedance of the maximum annual coating usage rate of 10,100 gallons combined from emissions unit R001 through R003, based upon a rolling 12-month summation of the month coating usage rates;

   d. any exceedance of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.c;

   e. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC emission limitation specified in section A.2.b. of this permit; and

f. any exceedance of the 1021.00 lbs OC/month from cleanup operations.

3. The permittee shall submit annual reports that summarize the actual OC emissions, in tons, from cleanup operations. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

a. Emission Limitation:
5.63 lbs OC/hr from coating operations

Applicable Compliance Method:
The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 0.86 gallons per hour and a maximum OC content of 6.55 pounds per gallon.

b. Emission Limitation:
1021.00 lbs OC/month & 6.13 tons OC/yr from cleanup operations

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.3. of this permit.

c. Emission Limitation:
33.08 tons OC per rolling, 12-month period from coating operations from R001 through R003 combined

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.2. of this permit.

d. Emission Limitation:
Annual HAP emissions from emissions units K001 through K012 and R001

through R003 combined shall not exceed 10 tons per rolling 12-month period for any individual HAP or 25.00 tons per rolling 12-month period for any combination of HAPs.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.4. of this permit.

e. Emission Limitation:
The maximum annual coating usage for emissions units R001 through R003 shall not exceed 10,100 gallons per year, based on a rolling, 12-month summation of the coating usage.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.2. of this permit.

f. Emission Limitation:
The OC content for all coatings employed in this emissions unit shall not exceed 6.55 lbs OC/gallon

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.1. of this permit.

F. Miscellaneous Requirements

1. None.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Stain & Varnish Spray Booth #2 (Modification to PTI 03-13929, issued on April 15, 2003 to allow for increase in emissions and establish federally enforceable emission limitations)	OAC rule 3745-31-05 (A) (3)	5.63 lbs organic compounds (OC)/hr from coating operations (See A.2.d) 1021.00 lbs OC/month & 6.13 tons OC/yr from cleanup operations See A.2.a
	OAC rule 3745-31-05 (C)	33.08 tons OC per rolling 12-month period from coating operations from R001-R003 combined (See A.2.b., B.1 and B.2) Annual hazardous air pollutant (HAP)* emissions from emissions unit K001-K012 & R001-R003 shall not exceed 10 tons per rolling 12-month period for and individual HAP and 25 tons per rolling 12-month period for all HAPs combined (see A.2.c)
	OAC rule 3745-21-07 (G) (2)	See B.3.

*Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (C).

2.b The emissions of OC from emissions units K001 through K012 and R001-R003 combined shall not exceed 33.08 tons per rolling 12-month period from coating operations based on coating usage restrictions (See B.1. and B.2.). For purposes of federal enforceability, emission limitations of OC effectively restrict volatile organic compound (VOC) emissions. Federally enforceable OC limitations are being established for purposes of limiting potential to emit.

2.c Annual HAP emissions from emissions units K001 through K012 & R001 through R003 shall not exceed 10 tons per rolling 12-month period for an individual HAP and 25 tons per rolling 12-month period for any combination of HAPs.

Rolling emissions limitations have been established in Permit to Install (PTI) #03-13929, issued on April 15, 2003, and, as such, rolling HAP emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

2.d The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 0.86 gallons per hour and a maximum OC content of 6.55 pounds per gallon.

B. Operational Restrictions

1. The maximum annual coating usage for emissions unit R001 through R003 combined shall not exceed 10,1000 gallons per year, based on a rolling, 12-month summation of the coating usage. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit the permittee shall not exceed the levels specified in the following table:

Month(s)	Maximum Allowable Coating Usage (gallons)
1	2525
1-2	3213
1-3	3901
1-4	4589
1-5	5277
1-6	5965
1-7	6653
1-8	7341
1-9	8029
1-10	8717
1-11	9405
1-12	10,100

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling 12-month summation of coating usage.

2. The OC content for all coatings employed in this emissions unit shall not exceed 6.55 lbs/gallon, as applied.

3. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for all coatings employed in this emissions unit:

   a. the name and identification number of each coating employed;

   b. the volume, in gallons, of each coating employed;

   c. the total volume, in gallons, of all coatings employed (sum of C.1.b.);

   d. documentation of whether or not each coating material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

   e. the OC content of each coating employed, in pounds per gallon, as applied;

f. the OC emissions from each coating material employed, in pounds (C.1.b. x C.1.e), for each coating employed; and

g. the total OC emissions from all coatings employed, in pounds (sum of C.1.f.).

2. In conjunction with the record keeping requirements specified in C.1. above, the permittee shall also record the following each month for emissions unit R001 through R003 combined:

a. for the first 12 months of operation, the cumulative monthly emission rate of OC, in tons per month;

b. beginning the first month after the 12 calendar months of operation, the rolling 12-month summation of the emission rate for OC, in tons;

c. during the first 12 calendar months of operation, the cumulative coating usage, in gallons; and

d. beginning the first month after the first 12 calendar months of operation, the rolling, 12-month summation of the coating usage, in gallons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

3. The permittee shall collect and record the following each month for cleanup operations:

a. the name and identification of each cleanup material employed;

b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

c. the OC content of each cleanup material employed, in pounds per gallon;

d. the number of gallons of each cleanup material employed;

e. the OC emissions from each cleanup material employed (C.3.c x C.3.d);

f. the total OC emissions from all cleanup materials employed (summation of C.3.e), in pounds or tons; and

g. The annual year to date OC emissions from cleanup operations, in tons per year (summation of C.3.f)

4. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K001 through K012 and R001 through R003 combined:

   a. the company identification of each coating and cleanup material employed;

   b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;

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

   d. the total emission rate for each HAP from all coatings and cleanup materials employed, [summation of each HAP emission rate (C.4.b x C.4.c) for each individual coating and cleanup material], in lbs/month;

   e. the total HAP emission rate for the combination of all HAPs from all coatings, and cleanup materials employed, (sum of C.4.d for all HAPs), in lbs/month; and

   f. the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

5. The permit to install for emissions units R001 through R003 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: 2-butoxy ethanol

   TLV (mg/m3): 96.66

   Maximum Hourly Emission Rate (lbs/hr): 0.96

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 262

MAGLC (ug/m3): 2301

Pollutant: 2-methyl 1-propanol

TLV (mg/m3): 151.575

Maximum Hourly Emission Rate (lbs/hr): 1.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 319.18

MAGLC (ug/m3): 3609

Pollutant: Diacetone Alcohol

TLV (mg/m3): 188.405

Maximum Hourly Emission Rate (lbs/hr): 3.12

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 851.14

MAGLC (ug/m3): 4486

Pollutant: Toluene

TLV (mg/m3): 188.405

Maximum Hourly Emission Rate (lbs/hr): 2.36

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 643.22

MAGLC (ug/m3): 4486

Pollutant: Methanol

TLV (mg/m3): 262.086

Maximum Hourly Emission Rate (lbs/hr): 16.89

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 4607.6

MAGLC (ug/m3): 6240

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

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

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

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

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of a photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:

   a. any exceedances of the 33.08 tons OC per rolling, 12-month period from coating operations for R001 through R003 combined;

   b. any exceedance of the maximum allowable coating OC content specified in B.2.;

   c. any exceedance of the maximum annual coating usage rate of 10,100 gallons combined from emissions unit R001 through R003, based upon a rolling 12-month summation of the month coating usage rates;

   d. any exceedance of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.c;

   e. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC emission limitation specified in section A.2.b. of this permit; and

f. any exceedance of the 1021.00 lbs OC/month from cleanup operations.

3. The permittee shall submit annual reports that summarize the actual OC emissions, in tons, from cleanup operations. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

a. Emission Limitation:
5.63 lbs OC/hr from coating operations

Applicable Compliance Method:
The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 0.86 gallons per hour and a maximum OC content of 6.55 pounds per gallon.

b. Emission Limitation:
1021.00 lbs OC/month & 6.13 tons OC/yr from cleanup operations

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.3. of this permit.

c. Emission Limitation:
33.08 tons OC per rolling, 12-month period from coating operations from R001 through R003 combined

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.2. of this permit.

d. Emission Limitation:
Annual HAP emissions from emissions units K001 through K012 and R001

through R003 combined shall not exceed 10 tons per rolling 12-month period for any individual HAP or 25.00 tons per rolling 12-month period for any combination of HAPs.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.4. of this permit.

e. Emission Limitation:
The maximum annual coating usage for emissions units R001 through R003 shall not exceed 10,100 gallons per year, based on a rolling, 12-month summation of the coating usage.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.2. of this permit.

f. Emission Limitation:
The OC content for all coatings employed in this emissions unit shall not exceed 6.55 lbs OC/gallon

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.1. of this permit.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Stain & Varnish Spray Booth #3 (Modification to PTI 03-13929, issued on April 15, 2003 to allow for increase in emissions and establish federally enforceable emission limitations)	OAC rule 3745-31-05 (A) (3)	5.63 lbs organic compounds (OC)/hr from coating operations (See A.2.d) 1021.00 lbs OC/month & 6.13 tons OC/yr from cleanup operations See A.2.a
	OAC rule 3745-31-05 (C)	33.08 tons OC per rolling 12-month period from coating operations from R001-R003 combined (See A.2.b.i, B.1 and B.2) Annual hazardous air pollutant (HAP)* emissions from emissions unit K001-K012 & R001-R003 shall not exceed 10 tons per rolling 12-month period for and individual HAP and 25 tons per rolling 12-month period for all HAPs combined (see A.2.c)
	OAC rule 3745-21-07 (G) (2)	See B.3.

*Hazardous Air Pollutant (HAP) means any air pollutant listed in or pursuant to Section 112 (b) of the Clean Air Act.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (C).

2.b The emissions of OC from emissions units K001 through K012 and R001-R003 combined shall not exceed 33.08 tons per rolling 12-month period from coating operations based on coating usage restrictions (See B.1. and B.2.). For purposes of federal enforceability, emission limitations of OC effectively restrict volatile organic compound (VOC) emissions. Federally enforceable OC limitations are being established for purposes of limiting potential to emit.

2.c Annual HAP emissions from emissions units K001 through K012 & R001 through R003 shall not exceed 10 tons per rolling 12-month period for an individual HAP and 25 tons per rolling 12-month period for any combination of HAPs.

Rolling emissions limitations have been established in Permit to Install (PTI) #03-13929, issued on April 15, 2003, and, as such, rolling HAP emission records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

2.d The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 0.86 gallons per hour and a maximum OC content of 6.55 pounds per gallon.

B. Operational Restrictions

1. The maximum annual coating usage for emissions unit R001 through R003 combined shall not exceed 10,1000 gallons per year, based on a rolling, 12-month summation of the coating usage. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit the permittee shall not exceed the levels specified in the following table:

Month(s)	Maximum Allowable Coating Usage (gallons)
1	2525
1-2	3213
1-3	3901
1-4	4589
1-5	5277
1-6	5965
1-7	6653
1-8	7341
1-9	8029
1-10	8717
1-11	9405
1-12	10,100

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling 12-month summation of coating usage.

2. The OC content for all coatings employed in this emissions unit shall not exceed 6.55 lbs/gallon, as applied.

3. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01, in this emissions unit is prohibited.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following information each month for all coatings employed in this emissions unit:

   a. the name and identification number of each coating employed;

   b. the volume, in gallons, of each coating employed;

   c. the total volume, in gallons, of all coatings employed (sum of C.1.b.);

   d. documentation of whether or not each coating material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

   e. the OC content of each coating employed, in pounds per gallon, as applied;

f. the OC emissions from each coating material employed, in pounds (C.1.b. x C.1.e), for each coating employed; and

g. the total OC emissions from all coatings employed, in pounds (sum of C.1.f.).

2. In conjunction with the record keeping requirements specified in C.1. above, the permittee shall also record the following each month for emissions unit R001 through R003 combined:

a. for the first 12 months of operation, the cumulative monthly emission rate of OC, in tons per month;

b. beginning the first month after the 12 calendar months of operation, the rolling 12-month summation of the emission rate for OC, in tons;

c. during the first 12 calendar months of operation, the cumulative coating usage, in gallons; and

d. beginning the first month after the first 12 calendar months of operation, the rolling, 12-month summation of the coating usage, in gallons.

Note: The information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

3. The permittee shall collect and record the following each month for cleanup operations:

a. the name and identification of each cleanup material employed;

b. documentation of whether or not each cleanup material employed is a photochemically reactive material, as defined in OAC rule 3745-21-01;

c. the OC content of each cleanup material employed, in pounds per gallon;

d. the number of gallons of each cleanup material employed;

e. the OC emissions from each cleanup material employed (C.3.c x C.3.d);

f. the total OC emissions from all cleanup materials employed (summation of C.3.e), in pounds or tons; and

g. The annual year to date OC emissions from cleanup operations, in tons per year

(summation of C.3.f)

4. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units K001 through K012 and R001 through R003 combined:

   a. the company identification of each coating and cleanup material employed;

   b. the pounds per gallon of each HAP in each coating and cleanup material, as applied;

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

   d. the total emission rate for each HAP from all coatings and cleanup materials employed, [summation of each HAP emission rate (C.4.b x C.4.c) for each individual coating and cleanup material], in lbs/month;

   e. the total HAP emission rate for the combination of all HAPs from all coatings, and cleanup materials employed, (sum of C.4.d for all HAPs), in lbs/month; and

   f. the annual emissions of each HAP and the combination of all HAPs, based upon a rolling 12-month summation.

5. The permit to install for emissions units R001 through R003 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: 2-butoxy ethanol

   TLV (mg/m3): 96.66

   Maximum Hourly Emission Rate (lbs/hr): 0.96

   Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 262

MAGLC (ug/m3): 2301

Pollutant: 2-methyl 1-propanol

TLV (mg/m3): 151.575

Maximum Hourly Emission Rate (lbs/hr): 1.17

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 319.18

MAGLC (ug/m3): 3609

Pollutant: Diacetone Alcohol

TLV (mg/m3): 188.405

Maximum Hourly Emission Rate (lbs/hr): 3.12

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 851.14

MAGLC (ug/m3): 4486

Pollutant: Toluene

TLV (mg/m3): 188.405

Maximum Hourly Emission Rate (lbs/hr): 2.36

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 643.22

MAGLC (ug/m3): 4486

Pollutant: Methanol

TLV (mg/m3): 262.086

Maximum Hourly Emission Rate (lbs/hr): 16.89

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4607.6

MAGLC (ug/m3): 6240

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

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

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

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

   If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

7. The permittee shall collect, record, and retain the following information when it

conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

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

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

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

D. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any monthly record showing the use of a photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the end of the calendar month.

2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:

   a. any exceedances of the 33.08 tons OC per rolling, 12-month period from coating operations for R001 through R003 combined;

   b. any exceedance of the maximum allowable coating OC content specified in B.2.;

   c. any exceedance of the maximum annual coating usage rate of 10,100 gallons combined from emissions unit R001 through R003, based upon a rolling 12-month summation of the month coating usage rates;

   d. any exceedance of the rolling individual HAP and combined HAPs emission limitations specified in section A.2.c;

   e. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative OC emission limitation specified in section A.2.b. of this permit; and

   f. any exceedance of the 1021.00 lbs OC/month from cleanup operations.

3. The permittee shall submit annual reports that summarize the actual OC emissions, in tons, from cleanup operations. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

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

   a. Emission Limitation:
   5.63 lbs OC/hr from coating operations

   Applicable Compliance Method:
   The hourly emission limitation represents the potential to emit* of the emissions unit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

   *The potential to emit is based on a worst-case coating operation involving a maximum coating usage rate of 0.86 gallons per hour and a maximum OC content of 6.55 pounds per gallon.

   b. Emission Limitation:
   1021.00 lbs OC/month & 6.13 tons OC/yr from cleanup operations

   Applicable Compliance Method:
   Compliance shall be based upon the record keeping requirements specified in section C.3. of this permit.

   c. Emission Limitation:
   33.08 tons OC per rolling, 12-month period from coating operations from R001 through R003 combined

   Applicable Compliance Method:
   Compliance shall be based upon the record keeping requirements specified in section C.2. of this permit.

   d. Emission Limitation:
   Annual HAP emissions from emissions units K001 through K012 and R001 through R003 combined shall not exceed 10 tons per rolling 12-month period for

any individual HAP or 25.00 tons per rolling 12-month period for any combination of HAPs.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.4. of this permit.

e. Emission Limitation:
The maximum annual coating usage for emissions units R001 through R003 shall not exceed 10,100 gallons per year, based on a rolling, 12-month summation of the coating usage.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.2. of this permit.

f. Emission Limitation:
The OC content for all coatings employed in this emissions unit shall not exceed 6.55 lbs OC/gallon

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in section C.1. of this permit.