



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

1/7/2013

Certified Mail

Wayne Gooley
CHAPPELL DOOR CO
C/O COURTHOUSE MANUFACTURING LLC
1730 WASHINGTON AVE
WASHINGTON COURT HOUSE, OH 43160-2322

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

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

Facility ID: 0124010126
Permit Number: P0082550
Permit Type: Renewal
County: Fayette

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Record Herald. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-CDO; Kentucky

PUBLIC NOTICE

1/7/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

CHAPPELL DOOR CO
1730 WASHINGTON AVE SOLAR LN,
WASHINGTON COURT HOUSE, OH 43160-0577
Fayette County
FACILITY DESC.: Other Millwork (including Flooring)

PERMIT #: P0082550

PERMIT TYPE: Renewal

PERMIT DESC: FEPTIO renewal permit for two spray booths (K001 & K003) and two groups of woodworking operations (P001 & P002), and initial PTIO for staining operation (P004) previously incorporated as part of K001 and K003.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Benjamin Halton, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
CHAPPELL DOOR CO**

Facility ID:	0124010126
Permit Number:	P0082550
Permit Type:	Renewal
Issued:	1/7/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



**Division of Air Pollution Control
Permit-to-Install and Operate
for
CHAPPELL DOOR CO**

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Authorization

Facility ID: 0124010126
 Application Number(s): A0012865, A0043649, A0044411
 Permit Number: P0082550
 Permit Description: FEPTIO renewal permit for two spray booths (K001 & K003) and two groups of woodworking operators (P001 & P002), and initial PTIO for staining operation (P004) previously incorporated as part of K001 and K003.
 Permit Type: Renewal
 Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
 Issue Date: 1/7/2013
 Effective Date: To be entered upon final issuance
 Expiration Date: To be entered upon final issuance
 Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

CHAPPELL DOOR CO
 1730 WASHINGTON AVE SOLAR LN
 WASHINGTON COURT HOUSE, OH 43160-0577

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
 50 West Town Street, 6th Floor
 P.O. Box 1049
 Columbus, OH 43216-1049
 (614)728-3778

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: P0082550

Permit Description: FEPTIO renewal permit for two spray booths (K001 & K003) and two groups of woodworking operations (P001 & P002), and initial PTIO for staining operation (P004) previously incorporated as part of K001 and K003.

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

Emissions Unit ID:	K001
Company Equipment ID:	Primary Booth
Superseded Permit Number:	01-6447
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Auxiliary Booth
Superseded Permit Number:	01-08459
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P001
Company Equipment ID:	South WoodWorking
Superseded Permit Number:	01-08642
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	North WoodWorking
Superseded Permit Number:	01-08642
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	Staining of wood doors
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
CHAPPELL DOOR CO
Permit Number: P0082550
Facility ID: 0124010126
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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.



Draft Permit-to-Install and Operate
CHAPPELL DOOR CO
Permit Number: P0082550
Facility ID: 0124010126
Effective Date: To be entered upon final issuance

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) B.2.

2. Applicable Emissions Limitations and/or Control Requirements

- a) The specific operations, property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and applicable emissions limitations and/or control measures are set forth 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(D) (Synthetic minor to avoid Title V for HAPs)	See b)(1).

b) Additional Terms and Conditions

- (1) This permit establishes the following federally enforceable limitations on emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, for the purpose of avoiding Maximum Achievable Control Technology (MACT) regulations and Title V permitting requirements:
 - a. The actual emissions from emissions units K001, K003,P004, and all other emission sources at the facility, including but not limited to any de minimis emissions units as defined in OAC rule 3745-15-05, or any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 9.9 tons for any single HAP, based upon a rolling, 12-month summation.
 - b. The actual emissions from emissions units K001, K003,P004, and all other emission sources at the facility, including but not limited to any de minimis emissions units as defined in OAC rule 3745-15-05, or any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 24.9 tons for any combination of HAPs, based upon a rolling, 12-month summation.



c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the purpose of calculating the rolling, 12-month summation of HAP emissions:
 - a. the total uncontrolled emissions of each individual HAP from any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, in tons, calculated in accordance with f)(1);
 - b. the total uncontrolled emissions of combined HAPs from any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, in tons, calculated in accordance with f)(1);
 - c. the total uncontrolled emissions of each individual HAP from emissions units K001, K003, and P004, in tons, calculated in accordance with f)(1).;
 - d. the total uncontrolled emissions of combined HAPs from emissions units K001, K003, and P004, in tons, calculated in accordance with f)(1);
 - e. the rolling, 12-month summation of the individual HAP emissions from all emissions units operating at the facility, in tons, calculated in accordance with f)(1); and
 - f. the rolling, 12-month summation of the total combined HAP emissions from all emissions units operating at the facility, in tons, calculated in accordance with f)(1).

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting the Central District Office.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.



- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. any exceedance of the rolling, 12-month individual HAP emission limitation for each HAP; and
 - ii. any exceedance of the rolling, 12-month total combined HAPs emission limitation.

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

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

f) Testing Requirements

(1) Emissions Limitations:

Emissions of any single HAP shall not exceed 9.9 tons per rolling, 12-month period.

Emissions of total combined HAPS shall not exceed 24.9 tons per rolling, 12-month period.

Applicable Compliance Method:

For any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, the permittee shall calculate HAP emissions consistent with the information presented in the installation and/or operating permit application using U.S. EPA approved emissions factors or emissions factors otherwise approved by Central District Office.

For emissions units K001 and K003, the permittee shall calculate HAP emissions consistent with the information presented in the installation and/or operating permit application. Monthly individual HAP emissions shall be calculated by multiplying the total monthly amount of each coating used (primer and non-primer) by the individual HAP content for each HAP in the coating. Monthly combined HAP emissions shall be determined by summing the individual monthly HAP emissions from each coating (primer and non-primer).

The rolling, 12-month individual and combined HAP emissions are determined by adding the total individual and combined HAP emissions for each month to the total individual and combined HAP emissions from the preceding 11 months.



Draft Permit-to-Install and Operate
CHAPPELL DOOR CO
Permit Number: P0082550
Facility ID: 0124010126
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. K001, Primary Booth

Operations, Property and/or Equipment Description:

Primary spray booth with dry filtration system and shared drying oven (fka R001)

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

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

a. b)(1)d., d)(7) through d)(10), and e)(3)

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

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

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)	<p>Volatile organic compound (VOC) emissions shall not exceed 36.0 pounds per hour (lbs/hr).</p> <p>Particulate emissions (PE) shall not exceed 2.70 lbs/hr.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT Subpart QQQQ)	<p>VOC emissions from emissions units K001 and K003 combined shall not exceed 75.30 tons per rolling, 12-month period.</p> <p>PE from emissions units K001 and K003 combined shall not exceed 5.13 tons per rolling, 12-month period.</p> <p>See c)(1) through c)(3)</p>
c.	OAC rule 3745-17-11(C)	See c)(4) and c)(5) and d)(2) thru d)(6)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	ORC 3704.03(F)	See d)(7) through d)(10)

(2) Additional Terms and Conditions

a. The hourly VOC and PE limitations were established to reflect the potential to emit for this emissions unit taking into consideration the federally enforceable restrictions established pursuant to OAC rules 3745-17-11(C) and 3745-31-05(D). The monitoring and/or recordkeeping, reporting, and testing requirements established pursuant to OAC rules 3745-17-11(C) and 3745-31-05(D) are sufficient to demonstrate compliance with these limitations.

c) Operational Restrictions

(1) The VOC content of any coating (primer or non-primer) utilized in emissions units K001 and K003 shall not exceed 6.0 pounds of VOC per gallon (lbs VOC/gal).

(2) The permittee shall not use more than 2,100 gallons of primer coating in emissions units K001 and K003 combined per rolling, 12-month period.

The permittee has existing records of the monthly primer coating usage; therefore, the first year of accumulating monthly primer coating usage limitations is not necessary.

(3) The permittee shall not use more than 23,000 gallons of non-primer coatings in emissions unit K001 and K003 combined per rolling, 12-month period.

The permittee has existing records of the monthly non-primer coating usage; therefore, the first year of accumulating monthly non-primer coating usage limitations is not necessary.

(4) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is 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.

(5) 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.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the coating operation:

- a. the company identification for each coating (primer and non-primer) employed;
- b. the number of gallons of each coating (primer and non-primer) employed;



- c. the density, in pounds per gallon, of each primer coating employed;
 - d. the density, in pounds per gallon, of each non-primer coating employed;
 - e. the VOC content, in pounds of VOC per gallon, of each primer coating employed;
 - f. the VOC content, in pounds of VOC per gallon, of each non-primer coating employed;
 - g. the solids content, in percent weight, of each primer coating employed;
 - h. the solids content, in percent weight, of each non-primer coating employed;
 - i. the monthly VOC emissions from all coatings, determined in accordance with f)(1)c.;
 - j. the rolling, 12-month VOC emissions from all coatings, determined in accordance with f)(1)c.;
 - k. the monthly PE from all coatings, determined in accordance with f)(1)d.; and
 - l. the rolling, 12-month PE from all coatings, determined in accordance with f)(1)d.
- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.



These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (6) 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 the 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.
- (7) The PTIO application for emissions unit K001 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., "24" hours per day and "7" 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):



$$TLV/10 \times 8/24 \times 5/7 = 4 \text{ TLV}/168 = \text{MAGLC}$$

- 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):

Toxic Contaminant: MIBK

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 8.16

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,710

MAGLC (ug/m³): 4,877

The permittee, has demonstrated that emissions of MIBK from emissions unit K001 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).

- (8) 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 PTIO 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.

- (9) 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.
 - (10) 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.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. any record demonstrating that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;



- ii. any record demonstrating that the coating (primer and non-primer) VOC content limitation of 6.0 lbs VOC/gal was exceeded;
 - iii. each rolling, 12-month period when the primer coating usage limitation of 2,100 gallons was exceeded;
 - iv. each rolling, 12-month period when the non-primer coating usage limitation of 23,000 gallons was exceeded;
 - v. each rolling, 12-month period when VOC emissions from emissions units K001 and K003 combined exceeded 75.30 tons; and
 - vi. each rolling, 12-month period when PE from emissions units K001 and K003 combined exceeded 5.13 tons;
- b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) The permittee shall include 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 predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
 - (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- 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. Emissions Limitation:
VOC emissions shall not exceed 36.0 lbs/hr.



Applicable Compliance Method:

The hourly VOC emissions limitation was established by multiplying the maximum allowable VOC content (6.0 lbs/gal) by the maximum coating application rate for this emissions unit (6.0 gal/hr).

b. Emissions Limitation:

PE shall not exceed 2.70 lbs/hr.

Applicable Compliance Method:

The hourly PE limitation was established using the solids content information for primer and non-primer coatings in accordance with the information provided in the permit application for the worst-case coating (primer) associated with PE, including the following:

Primer

Density: 10.3 lbs/gal

Solids Content: 39%

Primer Application Rate: 6.0 gal/hr

Transfer Efficiency: 60%

Capture Efficiency: 80%

Particulate Filter Control Efficiency: 90%

c. Emissions Limitation:

VOC emissions from emissions units K001 and K003 combined shall not exceed 75.30 tons per rolling, 12-month period.

Applicable Compliance Method:

The rolling, 12-month VOC emissions limitation was established by summing the maximum allowable VOC emissions from primer coating and maximum allowable VOC emissions from non-primer coatings.

The maximum allowable VOC emissions from primer coating was determined by multiplying the maximum allowable primer VOC content (6.0 lbs/gal) by the maximum allowable primer usage limitation (2,100 gallons) and then converting to tons by dividing by 2,000.

The maximum allowable VOC emissions from non-primer coatings was determined by multiplying the maximum allowable non-primer VOC content (6.0 lbs/gal) by the maximum allowable non-primer usage limitation (23,000 gallons) and then converting to tons by dividing by 2,000.

The permittee may demonstrate compliance with the rolling, 12-month VOC emissions limitation using the actual coating usage records and VOC content records required in d)(1) and the above calculations.



The rolling, 12-month VOC emissions are determined by adding the total VOC emissions for each month to the total VOC emissions from the preceding 11 months.

d. Emissions Limitation:

PE from emissions units K001 and K003 combined shall not exceed 5.13 tons per rolling, 12-month period.

Applicable Compliance Method:

The rolling, 12-month PE limitation was established by summing the maximum allowable PE from primer coating and maximum allowable PE from non-primer coatings.

The maximum allowable PE from primer coating was determined by multiplying the density (10.3 lbs/gal) by the solids content in percent weight (39%) and by the maximum allowable primer usage limitation (2,100 gallons) and then converting to tons by dividing by 2,000. The resulting PE value (4.22 tons) was then reduced to account for a transfer efficiency of 60% [multiplied by (1 - 0.60)] resulting in non-transferred PE of 1.69 tons. The non-transferred PE value (1.69 tons) was then reduced to account for a capture efficiency of 80% [multiplied by (1 - 0.80)] resulting in uncaptured PE of 0.34 tons. The non-transferred PE value (1.69 tons) was then reduced to account for a capture efficiency of 80% and a control efficiency of 90% [multiplied by 0.80 and (1 - 0.90)] resulting in captured PE of 0.13 tons. The total primer PE is determined by summing the uncaptured PE and the captured PE (0.34 tons + 0.13 tons = 0.47 tons primer PE).

The maximum allowable PE from non-primer coatings was determined by multiplying the density of the worst case non-primer coating associated with PE (9.04 lbs/gal) by the solids content in percent weight (40%) and by the maximum allowable non-primer usage limitation (23,000 gallons) and then converting to tons by dividing by 2,000. The resulting PE value (41.58 tons) was then reduced to account for a transfer efficiency of 60% [multiplied by (1 - 0.60)] resulting in non-transferred PE of 16.63 tons. The non-transferred PE value (16.63 tons) was then reduced to account for a capture efficiency of 80% [multiplied by (1 - 0.80)] resulting in uncaptured PE of 3.33 tons. The non-transferred PE value (16.63 tons) was then reduced to account for a capture efficiency of 80% and a control efficiency of 90% [multiplied by 0.80 and (1 - 0.90)] resulting in captured PE of 1.33 tons. The total non-primer PE is determined by summing the uncaptured PE and the captured PE (3.33 tons + 1.33 tons = 4.66 tons non-primer PE).

The rolling, 12-month PE limitation was established by summing the maximum allowable PE from primer coating and maximum allowable PE from non-primer coatings (0.47 tons non-primer PE + 4.66 tons primer PE = 5.13 tons PE per rolling, 12-month period).



Draft Permit-to-Install and Operate

CHAPPELL DOOR CO

Permit Number: P0082550

Facility ID: 0124010126

Effective Date: To be entered upon final issuance

The permittee may demonstrate compliance with the rolling, 12-month PE limitation using the actual coating usage records, coating density records, and solids content records required in d)(1) and the above calculations.

The rolling, 12-month PE are determined by adding the total PE for each month to the total PE from the preceding 11 months.

g) Miscellaneous Requirements

(1) None.



2. K003, Auxiliary Booth

Operations, Property and/or Equipment Description:

Auxilliary spray booth with dry filtration system and shared drying oven (fka R003)

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

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

a. b)(1)d., d)(7) through d)(10), and e)(3)

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

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

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)	<p>Volatile organic compound (VOC) emissions shall not exceed 36.0 pounds per hour (lbs/hr).</p> <p>Particulate emissions (PE) shall not exceed 2.70 lbs/hr.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT Subpart QQQQ)	<p>VOC emissions from emissions units K001 and K003 combined shall not exceed 75.30 tons per rolling, 12-month period.</p> <p>PE from emissions units K001 and K003 combined shall not exceed 5.13 tons per rolling, 12-month period.</p> <p>See c)(1) through c)(3)</p>
c.	OAC rule 3745-17-11(C)	See c)(4) and c)(5) and d)(2) thru d)(6)



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	ORC 3704.03(F)	See d)(7) through d)(10)

(2) Additional Terms and Conditions

a. The hourly VOC and PE limitations were established to reflect the potential to emit for this emissions unit taking into consideration the federally enforceable restrictions established pursuant to OAC rules 3745-17-11(C) and 3745-31-05(D). The monitoring and/or recordkeeping, reporting, and testing requirements established pursuant to OAC rules 3745-17-11(C) and 3745-31-05(D) are sufficient to demonstrate compliance with these limitations.

c) Operational Restrictions

(1) The VOC content of any coating (primer or non-primer) utilized in emissions units K001 and K003 shall not exceed 6.0 pounds of VOC per gallon (lbs VOC/gal).

(2) The permittee shall not use more than 2,100 gallons of primer coating in emissions units K001 and K003 combined per rolling, 12-month period.

The permittee has existing records of the monthly primer coating usage; therefore, the first year of accumulating monthly primer coating usage limitations is not necessary.

(3) The permittee shall not use more than 23,000 gallons of non-primer coatings in emissions unit K001 and K003 combined per rolling, 12-month period.

The permittee has existing records of the monthly non-primer coating usage; therefore, the first year of accumulating monthly non-primer coating usage limitations is not necessary.

(4) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is 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.

(5) 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.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for the coating operation:

- a. the company identification for each coating (primer and non-primer) employed;
- b. the number of gallons of each coating (primer and non-primer) employed;



- c. the density, in pounds per gallon, of each primer coating employed;
 - d. the density, in pounds per gallon, of each non-primer coating employed;
 - e. the VOC content, in pounds of VOC per gallon, of each primer coating employed;
 - f. the VOC content, in pounds of VOC per gallon, of each non-primer coating employed;
 - g. the solids content, in percent weight, of each primer coating employed;
 - h. the solids content, in percent weight, of each non-primer coating employed;
 - i. the monthly VOC emissions from all coatings, determined in accordance with f)(1)c.;
 - j. the rolling, 12-month VOC emissions from all coatings, determined in accordance with f)(1)c.;
 - k. the monthly PE from all coatings, determined in accordance with f)(1)d.; and
 - l. the rolling, 12-month PE from all coatings, determined in accordance with f)(1)d.
- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
- a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.



These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (6) 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 the 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.
- (7) The PTIO application for emissions unit K003 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., "24" hours per day and "7" 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):



$$TLV/10 \times 8/24 \times 5/7 = 4 \text{ TLV}/168 = \text{MAGLC}$$

- 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):

Toxic Contaminant: MIBK

TLV (mg/m³): 204.83

Maximum Hourly Emission Rate (lbs/hr): 8.16

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1,710

MAGLC (ug/m³): 4,877

The permittee, has demonstrated that emissions of MIBK from emissions unit K003 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).

- (8) 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 PTIO 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.

- (9) 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.
 - (10) 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.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. any record demonstrating that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation;



- ii. any record demonstrating that the coating (primer and non-primer) VOC content limitation of 6.0 lbs VOC/gal was exceeded;
 - iii. each rolling, 12-month period when the primer coating usage limitation of 2,100 gallons was exceeded;
 - iv. each rolling, 12-month period when the non-primer coating usage limitation of 23,000 gallons was exceeded;
 - v. each rolling, 12-month period when VOC emissions from emissions units K001 and K003 combined exceeded 75.30 tons; and
 - vi. each rolling, 12-month period when PE from emissions units K001 and K003 combined exceeded 5.13 tons;
- b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) The permittee shall include 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 predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
 - (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- 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. Emissions Limitation:
VOC emissions shall not exceed 36.0 lbs/hr.



Applicable Compliance Method:

The hourly VOC emissions limitation was established by multiplying the maximum allowable VOC content (6.0 lbs/gal) by the maximum coating application rate for this emissions unit (6.0 gal/hr).

b. Emissions Limitation:

PE shall not exceed 2.70 lbs/hr.

Applicable Compliance Method:

The hourly PE limitation was established using the solids content information for primer and non-primer coatings in accordance with the information provided in the permit application for the worst-case coating (primer) associated with PE, including the following:

Primer

Density: 10.3 lbs/gal

Solids Content: 39%

Primer Application Rate: 6.0 gal/hr

Transfer Efficiency: 60%

Capture Efficiency: 80%

Particulate Filter Control Efficiency: 90%

c. Emissions Limitation:

VOC emissions from emissions units K001 and K003 combined shall not exceed 75.30 tons per rolling, 12-month period.

Applicable Compliance Method:

The rolling, 12-month VOC emissions limitation was established by summing the maximum allowable VOC emissions from primer coating and maximum allowable VOC emissions from non-primer coatings.

The maximum allowable VOC emissions from primer coating was determined by multiplying the maximum allowable primer VOC content (6.0 lbs/gal) by the maximum allowable primer usage limitation (2,100 gallons) and then converting to tons by dividing by 2,000.

The maximum allowable VOC emissions from non-primer coatings was determined by multiplying the maximum allowable non-primer VOC content (6.0 lbs/gal) by the maximum allowable non-primer usage limitation (23,000 gallons) and then converting to tons by dividing by 2,000.

The permittee may demonstrate compliance with the rolling, 12-month VOC emissions limitation using the actual coating usage records and VOC content records required in d)(1) and the above calculations.



The rolling, 12-month VOC emissions are determined by adding the total VOC emissions for each month to the total VOC emissions from the preceding 11 months.

d. Emissions Limitation:

PE from emissions units K001 and K003 combined shall not exceed 5.13 tons per rolling, 12-month period.

Applicable Compliance Method:

The rolling, 12-month PE limitation was established by summing the maximum allowable PE from primer coating and maximum allowable PE from non-primer coatings.

The maximum allowable PE from primer coating was determined by multiplying the density (10.3 lbs/gal) by the solids content in percent weight (39%) and by the maximum allowable primer usage limitation (2,100 gallons) and then converting to tons by dividing by 2,000. The resulting PE value (4.22 tons) was then reduced to account for a transfer efficiency of 60% [multiplied by (1 - 0.60)] resulting in non-transferred PE of 1.69 tons. The non-transferred PE value (1.69 tons) was then reduced to account for a capture efficiency of 80% [multiplied by (1 - 0.80)] resulting in uncaptured PE of 0.34 tons. The non-transferred PE value (1.69 tons) was then reduced to account for a capture efficiency of 80% and a control efficiency of 90% [multiplied by 0.80 and (1 - 0.90)] resulting in captured PE of 0.13 tons. The total primer PE is determined by summing the uncaptured PE and the captured PE (0.34 tons + 0.13 tons = 0.47 tons primer PE).

The maximum allowable PE from non-primer coatings was determined by multiplying the density of the worst case non-primer coating associated with PE (9.04 lbs/gal) by the solids content in percent weight (40%) and by the maximum allowable non-primer usage limitation (23,000 gallons) and then converting to tons by dividing by 2,000. The resulting PE value (41.58 tons) was then reduced to account for a transfer efficiency of 60% [multiplied by (1 - 0.60)] resulting in non-transferred PE of 16.63 tons. The non-transferred PE value (16.63 tons) was then reduced to account for a capture efficiency of 80% [multiplied by (1 - 0.80)] resulting in uncaptured PE of 3.33 tons. The non-transferred PE value (16.63 tons) was then reduced to account for a capture efficiency of 80% and a control efficiency of 90% [multiplied by 0.80 and (1 - 0.90)] resulting in captured PE of 1.33 tons. The total non-primer PE is determined by summing the uncaptured PE and the captured PE (3.33 tons + 1.33 tons = 4.66 tons non-primer PE).

The rolling, 12-month PE limitation was established by summing the maximum allowable PE from primer coating and maximum allowable PE from non-primer coatings (0.47 tons non-primer PE + 4.66 tons primer PE = 5.13 tons PE per rolling, 12-month period).



Draft Permit-to-Install and Operate

CHAPPELL DOOR CO

Permit Number: P0082550

Facility ID: 0124010126

Effective Date: To be entered upon final issuance

The permittee may demonstrate compliance with the rolling, 12-month PE limitation using the actual coating usage records, coating density records, and solids content records required in d)(1) and the above calculations.

The rolling, 12-month PE are determined by adding the total PE for each month to the total PE from the preceding 11 months.

g) Miscellaneous Requirements

(1) None.



3. P001, South WoodWorking

Operations, Property and/or Equipment Description:

Miscellaneous wood working equipment vented to south cyclone, including; edge machine, primary hinge machine, back-up hinge machine, edge bander, lite cut-out/profiler machine1, sander1, and sander2.

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. None.

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

a. b)(1)b., c)(1) through c)(3), d)(1), e)(4), and f)(1)b.

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)	Particulate emissions (PE) from the cyclone stack serving this emissions unit shall not exceed 5.0 pounds per hour (lbs/hr). Visible PE from the cyclone stack shall not exceed 15% as a 6-minute average, except as provided by law. See b)(2)a.
b.	OAC rule 3745-31-05(D)	PE from the cyclone stacks serving emissions units P001 and P002 combined shall not exceed 20.0 tons per rolling, 12-month period. See c)(1) through c)(3)
c.	OAC rule 3745-17-07(A)	The visible PE limitation established by



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-11(B)(1)	The PE limitation established by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The hourly PE limitation was established to reflect the potential to emit for this emissions unit, as controlled by a sawdust collection system and cyclone. The monitoring, recordkeeping, reporting, and testing requirements for the sawdust collection system and cyclone as established in the following terms and conditions are sufficient to demonstrate compliance with this limitation.

c) Operational Restrictions

(1) The sawdust collection system and cyclone shall be operated and enclosures shall be maintained under negative pressure whenever any woodworking equipment associated with emissions unit P001 is in operation.

The permittee shall vent emissions to, operate and maintain the sawdust collection system and cyclone according to manufactures specifications to maximize capture efficiency and control capabilities.

(2) Pursuant to OAC rule 3745-31-03(A)(1)(y), the permittee may operate the woodworking equipment associated with this emissions unit in a manner that is consistent with the provisions of the permit exemption, provided that the criteria identified in the exemption are met and documented. During any period when the woodworking equipment associated with this emissions unit are operating in accordance with OAC rule 3745-31-03(A)(1)(y), such equipment is not required to be vented to the sawdust collection system and cyclone. This provision is intended to allow the permitteeto temporarily (seasonally) alter the sawdust collection system with which the woodworking equipment is being controlled. In the event that any woodworking equipment associated with this emissions unit is permanently altered pursuant to OAC rule 3745-31-03(A)(1)(y), the permittee shall submit an administrative permit modification application and facility profile update through the Ohio EPA's eBusiness Center: Air Services online web portal.

(3) The maximum, combined operating hours for the sawdust collection systems and cyclonesserving emissions units P001 and P002 shall not exceed 8,000 hours per rolling, 12-month period.

The permittee has existing records of the hours of operation for each sawdust collection system and cyclone; therefore, the first year of accumulating, monthly operating hour limitations is not necessary.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the total operating hours for the sawdust collection system and cyclone serving emissions unit P001;
 - b. the total operating hours for the sawdust collection system and cyclone serving emissions unit P002;
 - c. the rolling, 12-month summation of operating hours for the sawdust collection system and cyclone serving emissions unit P001;
 - d. the rolling, 12-month summation of operating hours for the sawdust collection system and cyclone serving emissions unit P002;
 - e. the combined, rolling, 12-month summation of operating hours for the sawdust collection systems and cyclones serving emissions units P001 and P002;
 - f. the rolling, 12-month summation of PE from emissions unit P001;
 - g. the rolling, 12-month summation of PE from emissions unit P002; and
 - h. the combined, rolling, 12-month PE from emissions units P001 and P002.
- (2) The permittee shall perform daily checks for visible emissions from the cyclone stack when the emissions units are in operation and when the weather conditions allow. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit.



The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (3) The permittee shall submit quarterly deviation (excursion) reports identifying all days during which any visible particulate emissions were observed from the cyclone stack serving this emissions unit and describe any corrective actions taken to eliminate the visible particulate emissions.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. any period of time (start time and date, and end time and date) when any woodworking equipment associated with emissions unit P001 was/were in operation and the sawdust collection system and cyclone were not operated, except as provided in c)(2);
 - ii. each rolling, 12-month period during which the combined operating hours for the sawdust collection systems and cyclone serving emissions units P001 and P002 shall not exceed 8,000 hours; and
 - iii. each rolling, 12-month period during which the combined PE from the cyclone stacks serving emissions units P001 and P002 exceeded 20.0 tons.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

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

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. Emissions Limitation:

PE from the cyclone stack serving this emissions unit shall not exceed 5.0 lbs/hr.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

b. Emissions Limitation:

PE from the cyclone stacks serving emissions units P001 and P002 combined shall not exceed 20.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month PE limitation shall be determined by the combined, rolling, 12-month summation of operating hours for the sawdust collection systems and cyclones serving emissions units P001 and P002 required by d)(1)(e) multiplied by the hourly PE limitation of 5.0 lbs/hr.

c. Emissions Limitation:

Visible PE from the cyclone stack shall not exceed 15% as a 6-minute average, except as provided by law.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) None.



4. P002, North WoodWorking

Operations, Property and/or Equipment Description:

Miscellaneous wood working equipment vented to north cyclone, including; planer, molder, radial arm saw¹, radial arm saw², panel saw, sander³, double-pass trim saw, lite cut-out/profiler machine², and rip saw.

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. None.

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

a. b)(1)b., c)(1) through c)(3), d)(1), e)(4), and f)(1)b.

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)	Particulate emissions (PE) from the cyclone stack serving this emissions unit shall not exceed 5.0 pounds per hour (lbs/hr). Visible PE from the cyclone stack shall not exceed 15% as a 6-minute average, except as provided by law. See b)(2)a.
b.	OAC rule 3745-31-05(D)	PE from the cyclone stacks serving emissions units P001 and P002 combined shall not exceed 20.0 tons per rolling, 12-month period. See c)(1) through c)(3)
c.	OAC rule 3745-17-07(A)	The visible PE limitation established by



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-11(B)(1)	The PE limitation established by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The hourly PE limitation was established to reflect the potential to emit for this emissions unit, as controlled by a sawdust collection system and cyclone. The monitoring, recordkeeping, reporting, and testing requirements for the sawdust collection system and cyclone as established in the following terms and conditions are sufficient to demonstrate compliance with this limitation.

c) Operational Restrictions

(1) The sawdust collection system and cyclone shall be operated and enclosures shall be maintained under negative pressure whenever any woodworking equipment associated with emissions unit P001 is in operation.

The permittee shall vent emissions to, operate and maintain the sawdust collection system and cyclone according to manufactures specifications to maximize capture efficiency and control capabilities.

(2) Pursuant to OAC rule 3745-31-03(A)(1)(y), the permittee may operate the woodworking equipment associated with this emissions unit in a manner that is consistent with the provisions of the permit exemption, provided that the criteria identified in the exemption are met and documented. During any period when the woodworking equipment associated with this emissions unit are operating in accordance with OAC rule 3745-31-03(A)(1)(y), such equipment is not required to be vented to the sawdust collection system and cyclone. This provision is intended to allow the permitteeto temporarily (seasonally) alter the sawdust collection system with which the woodworking equipment is being controlled. In the event that any woodworking equipment associated with this emissions unit is permanently altered pursuant to OAC rule 3745-31-03(A)(1)(y), the permittee shall submit an administrative permit modification application and facility profile update through the Ohio EPA's eBusiness Center: Air Services online web portal.

(3) The maximum, combined operating hours for the sawdust collection systems and cyclonesserving emissions units P001 and P002 shall not exceed 8,000 hours per rolling, 12-month period.

The permittee has existing records of the hours of operation for each sawdust collection system and cyclone; therefore, the first year of accumulating, monthly operating hour limitations is not necessary.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the total operating hours for the sawdust collection system and cyclone serving emissions unit P001;
 - b. the total operating hours for the sawdust collection system and cyclone serving emissions unit P002;
 - c. the rolling, 12-month summation of operating hours for the sawdust collection system and cyclone serving emissions unit P001;
 - d. the rolling, 12-month summation of operating hours for the sawdust collection system and cyclone serving emissions unit P002;
 - e. the combined, rolling, 12-month summation of operating hours for the sawdust collection systems and cyclones serving emissions units P001 and P002;
 - f. the rolling, 12-month summation of PE from emissions unit P001;
 - g. the rolling, 12-month summation of PE from emissions unit P002; and
 - h. the combined, rolling, 12-month PE from emissions units P001 and P002.
- (2) The permittee shall perform daily checks for visible emissions from the cyclone stack when the emissions units are in operation and when the weather conditions allow. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit.



The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (3) The permittee shall submit quarterly deviation (excursion) reports identifying all days during which any visible particulate emissions were observed from the cyclone stack serving this emissions unit and describe any corrective actions taken to eliminate the visible particulate emissions.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. any period of time (start time and date, and end time and date) when any woodworking equipment associated with emissions unit P002 was/were in operation and the sawdust collection system and cyclone were not operated, except as provided in c)(2);
 - ii. each rolling, 12-month period during which the combined operating hours for the sawdust collection systems and cyclone serving emissions units P001 and P002 shall not exceed 8,000 hours; and
 - iii. each rolling, 12-month period during which the combined PE from the cyclone stacks serving emissions units P001 and P002 exceeded 20.0 tons.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

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

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. Emissions Limitation:

PE from the cyclone stack serving this emissions unit shall not exceed 5.0 lbs/hr.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

b. Emissions Limitation:

PE from the cyclone stacks serving emissions units P001 and P002 combined shall not exceed 20.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with the rolling, 12-month PE limitation shall be determined by the combined, rolling, 12-month summation of operating hours for the sawdust collection systems and cyclones serving emissions units P001 and P002 required by d)(1)(e) multiplied by the hourly PE limitation of 5.0 lbs/hr.

c. Emissions Limitation:

Visible PE from the cyclone stack shall not exceed 15% as a 6-minute average, except as provided by law.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

- (1) None.



5. P004, Staining of wood doors

Operations, Property and/or Equipment Description:

Surface preparation and staining of wood doors and shared drying oven.

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

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

a. None.

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

a. b)(1)b., c)(1), c)(2), d)(1), e)(4), and f)(1)b.

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)	<p>Volatile organic compound (VOC) emissions shall not exceed 9.75 pounds per hour (lbs/hr).</p> <p>There shall be no visible emissions of fugitive dust from the building egress points nearest to this emissions unit.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V and MACT Subpart QQQQ)	<p>VOC emissions shall not exceed 21.13 tons per rolling, 12-month period.</p> <p>See c)(1) and c)(2)</p>

(2) Additional Terms and Conditions

a. The hourly VOC emissions limitation was established to reflect the potential to emit for this emissions unit taking into consideration the federally enforceable



restrictions established pursuant to OAC rule 3745-31-05(D). The monitoring and/or recordkeeping, reporting, and testing requirements established pursuant to OAC rule 3745-31-05(D) are sufficient to demonstrate compliance with this limitation.

c) Operational Restrictions

- (1) The VOC content of any coating (stain) utilized in this emissions unit shall not exceed 6.5 pounds of VOC per gallon (lbs VOC/gal).
- (2) The permittee shall not use more than 6,500 gallons of coatings (stains) in this emissions unit per rolling, 12-month period.

The permittee has existing records of the monthly coating (stain) usage; therefore, the first year of accumulating monthly primer coating usage limitations is not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for the coating operation:
 - a. the company identification for each coating (stain) employed;
 - b. the number of gallons of each coating (stain) employed;
 - c. the VOC content, in pounds of VOC per gallon, of each coating (stain) employed;
 - d. the monthly VOC emissions from all coatings (stains), determined in accordance with f)(1)b.; and
 - e. the rolling, 12-month VOC emissions from all coatings (stains), determined in accordance with f)(1)b.
- (2) The permittee shall perform daily checks for visible emissions from the nearest egress points (e.g., windows, doorways, ventilation stacks, etc.) to this emissions unit when the emissions unit is in operation and when the weather conditions allow. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to eliminate the visible emissions.



e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall submit quarterly deviation (excursion) reports identifying all days during which any visible emissions were observed from the nearest egress points to this emissions unit and describe any corrective actions taken to eliminate the visible emissions.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. any record demonstrating that the coating (stain) VOC content limitation of 6.5 lbs VOC/gal was exceeded;
 - ii. each rolling, 12-month period when the coating (stain) usage limitation of 6,500 gallons was exceeded; and
 - iii. each rolling, 12-month period when VOC emissions exceeded 21.13 tons.

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

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

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. Emissions Limitation:

VOC emissions shall not exceed 9.75 lbs/hr.



Applicable Compliance Method:

The hourly VOC emissions limitation was established by multiplying the maximum allowable VOC content (6.5 lbs/gal) by the maximum coating application rate for this emissions unit (1.5 gal/hr).

b. Emissions Limitation:

VOC emissions shall not exceed 21.13 tons per rolling, 12-month period.

Applicable Compliance Method:

The rolling, 12-month VOC emissions limitation was established determined by multiplying the maximum allowable coating (stain) VOC content (6.5 lbs/hr) by the maximum allowable coating (stain) usage limitation (6,500 gallons) and then converting to tons by dividing by 2,000.

The permittee may demonstrate compliance with the rolling, 12-month VOC emissions limitation using the actual coating usage records and VOC content records required in d)(1) and the above calculation.

The rolling, 12-month VOC emissions are determined by adding the total VOC emissions for each month to the total VOC emissions from the preceding 11 months.

g) Miscellaneous Requirements

(1) None.