



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 03-16176

Fac ID: 0369000045

DATE: 6/22/2006

Clymer Acquisition
Greg Christy
407 E. Washington Street
Pandora, OH 45877

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

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

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

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 6/22/2006
Effective Date: 6/22/2006**

FINAL PERMIT TO INSTALL 03-16176

Application Number: 03-16176
Facility ID: 0369000045
Permit Fee: **\$600**
Name of Facility: Clymer Acquisition
Person to Contact: Greg Christy
Address: 407 E. Washington Street
Pandora, OH 45877

Location of proposed air contaminant source(s) [emissions unit(s)]:
**407 E. Washington Street
Pandora, Ohio**

Description of proposed emissions unit(s):
Industrial storage racking.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	69.03
PE	3.12

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
	OAC rule 3745-17-11(B)
	OAC rule 3745-17-07(A)
K001 - metal furniture coating line consisting of 2 spray booths and dry-off oven (Main Paint Line)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)
	OAC rule 3745-21-09(I)

Applicable Emissions
Limitations/Control Measures

80.01 pounds of volatile organic compounds (VOC) per hour from coating operations

1225.8 pounds VOC per month, 7.35 tons VOC per year from cleanup operations

4.49 pounds particulate emissions (PE) per hour, 2.95 tons PE per year

Visible particulate emissions shall not exceed 0% opacity, as a six-minute average

See A.2.a and A.2.d

52.50 tons VOC per rolling, 12-month period from coating operations (See A.2.c, A.2.e, and B.1)

3.00 pounds of VOC per gallon of coating, excluding water and exempt solvents
see A.2.b

see A.2.b

2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(I).
- 2.b** The emission limitation specified by this rule is less stringent than the emission

limitation established pursuant to OAC rule 3745-31-05(A)(3).

- 2.c** The emissions of VOC from this emissions unit shall not exceed 52.50 tons per rolling 12-month period from coating operations. The VOC emission limitation is based on material usage and content restrictions (See B.1 and A.2.e). Federally enforceable VOC limitations are being established for purposes of avoiding Title V and PSD applicability.
- 2.d** Best available technology (BAT) control requirements for this emissions unit has been determined to be the use of dry filtration for control of particulate emissions.
- 2.e** The maximum VOC content for coatings employed in this emissions unit is restricted to 3.0 lbs/gallon as established by OAC rule 3745-21-09 (I).

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 35,000 gallons based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative coating usage rates specified in the following table:

Maximum Allowable Cumulative Coating Usage (gallons)

Month(s)	Gallon Usage
1-1	7,000
1-2	14,000
1-3	21,000
1-4	28,000
1-12	35,000

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

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following each month for coating usage in this emission unit:
 - a. the company name and identification for each coating employed;
 - b. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - c. the VOC content of each coating, as applied, in lbs/gallon;
 - d. the number of gallons of each coating employed;
 - e. the total number of gallons of all the coatings employed (summation of C.1.d for all coatings);
 - f. the VOC emission rate for each coating employed (C.1.c x C.1.d), in pounds;
 - g. the total VOC emission rate for all coatings employed (summation of C.1.f for all coatings), in pounds;
 - h. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
 - i. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month VOC emission rate, in tons;
 - j. for the first 12 months of operation, following the issuance of this permit, the cumulative coatings usage rate, in gallons; and
 - k. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coating usage rate, in gallons.
2. The permittee shall collect and record the following each month for cleanup operations in this emission unit:

Emissions Unit ID: **K001**

- a. the company name and identification for each cleanup material employed;
 - b. the VOC content of each cleanup material employed, in lbs/gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the VOC emission rate for each cleanup material employed (C.2.b x C.2.c), in pounds;
 - e. the total VOC emission rate for all cleanup materials employed (summation of C.2.d for all cleanup materials), in pounds;
 - f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of C.2.e for each calendar month to date from January to December).
3. The Permit to Install for this emissions units was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the Screen3 model. The predicted 1-hour maximum ground-level concentration from the use of the Screen3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: methyl n-amyl ketone

TLV (ug/m^3): 233,497

Maximum Hourly Emission Rate (lbs/hr): 35.74

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 3360.4

MAGLC (ug/m^3): 5559.5

Pollutant: isobutyl alcohol

TLV (ug/m^3): 151,575

Maximum Hourly Emission Rate (lbs/hr): 10.0537

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m^3): 945.4

MAGLC (ug/m^3): 3608.9

Pollutant: n-butyl alcohol

TLV (ug/m^3): 60,630

Maximum Hourly Emission Rate (lbs/hr): 4.5642

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 429.2
MAGLC ($\mu\text{g}/\text{m}^3$): 1443.6

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

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

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Emissions Unit ID: K001

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
6. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the rolling, 12-month VOC emission limitation of 52.50 tons.
 - b. All exceedances of the monthly VOC emission limitation of 1,225.8 pounds from the cleanup operations.
 - c. All exceedances of the rolling, 12-month coatings usage restriction of 35,000 gallons.
 - d. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings usage rates specified in section B.1.

These reports shall be submitted in accordance with the general terms and conditions of this permit.

2. The permittee shall notify the Director (the Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings (i.e., coatings that exceed the 3.00 lbs of VOC/gallon excluding water and exempt solvents). The notification shall include a copy of such record and shall be sent to the Director (the Northwest District Office) within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
80.01 pounds VOC per hour for coating operations

Applicable Compliance Method:

The hourly allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (26.67 gallons per hour) by the maximum VOC content of all the coatings (3.00 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

- b. Emission Limitation:
52.50 tons VOC per rolling, 12-month period, from coating operations

Applicable Compliance Method:

Compliance shall be based on the record keeping requirements as specified in C.1 of this permit.

- c. Emission Limitation:
The maximum annual coatings usage rate shall not exceed 35,000 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.

Applicable Compliance Method:

Compliance with the annual allowable coatings usage restriction above shall be based upon the record keeping requirements specified in section C.1 of this permit.

- d. Emission Limitation:
1225.8 lbs VOC per month, 7.35 tons VOC per year from cleanup operations

Applicable Compliance Method:

Compliance with the monthly allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section C.2 of this permit.

- e. Emission Limitation:
3.00 pounds VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit. Formulation

Emissions Unit ID: **K001**

data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.

- f. Emission Limitation:
 4.49 pounds PE per hour; 2.95 tons PE per year

Applicable Compliance Method:

The permittee may calculate actual PE rate from the unit utilizing the following equation:

$$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$

where:

$$E = \text{PE rate (pounds/hour)}.$$

maximum coating solids usage rate = (highest density of coating)X(highest solids content in %)X(26.67 gallons per hour)

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used where in this case it is 75%.

CE = Control efficiency of the control equipment (paint booth filters) considered at 90%.

If required, compliance with the hourly PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The annual allowable PE limitation was developed by multiplying the annual material usage limitation with the highest solids pound per gallon of coating, and then dividing by 2000. Therefore, if compliance is shown with the hourly material usage limitation, compliance is shown with the annual limitation.

- g. Emission Limitation:
 Visible particulate emissions shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60,

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PTI A

Issued: 6/22/2006

Emissions Unit ID: **K001**

Appendix A.

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>		<u>Applicable Rules/Requirements</u>
K002 - miscellaneous metal parts/metal furniture coating operation (Drive-in Paint Booth)	miscellaneous metal parts coating operations metal furniture coating operations	OAC rule 3745-31-05(A)(3)
		OAC rule 3745-17-11(B)
		OAC rule 3745-17-07(A)
		OAC rule 3745-31-05(C)
		OAC rule 3745-21-09(U)(1)(d)

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PTI A

Issued: 6/22/2006

Emissions Unit ID: **K002**

OAC rule 3745-21-09(l)

Applicable Emissions
Limitations/Control Measures

7.00 pounds of volatile organic compounds (VOC) per hour

58.8 pounds VOC per month;
0.35 tons VOC per year from
cleanup operations

0.14 pound particulate
emissions (PE) per hour, 0.17
tons PE per year

Visible particulate emissions
shall not exceed 0% opacity, as
a six-minute average

see A.2.a and A.2.e

See A.2.b

See A.2.c

8.82 tons VOC per rolling,
12-month period from coating
operations (See A.2.d, A.2.f, and
B.1)

3.50 pounds of VOC per gallon
of coating, excluding water and
exempt solvents (see A.2.g)
3.00 pounds of VOC per gallon
of coating, excluding water and
exempt solvents (see A.2.g)

2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C), OAC rule 3745-21-09(I), and OAC rule 3745-21-09(U)(1)(d).
- 2.b** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II in OAC rule 3745-17-11 does not apply. Also, Table I does not apply since the facility is located in Putnam county.
- 2.c** This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.d** The emissions of VOC from this emissions unit shall not exceed 8.82 tons per rolling 12-month period from coating operations. The VOC emission limitation is based on material usage and content restrictions (See B.1 and A.2.f). Federally enforceable VOC limitations are being established for purposes of avoiding Title V and PSD applicability.
- 2.e** Best available technology (BAT) control requirements for this emissions unit has been determined to be the use of dry filtration for control of particulate emissions.
- 2.f** The maximum VOC content for coatings employed in this emissions unit is restricted to 3.5 lbs/gallon as established by OAC rule 3745-21-09(U)(1)(d).
- 2.g** This emissions unit applies coatings to miscellaneous metal parts and to metal furniture. When coating miscellaneous metal parts, the emissions unit is subject to OAC rule 3745-21-09(U)(1)(d) requiring the use of a compliant coating that does not exceed 3.50 pounds VOC per gallon excluding water and exempt solvents. When coating metal furniture, the emissions unit is subject to OAC rule 3745-21-09(I) requiring the use of a compliant coating that does not exceed 3.00 pounds VOC per gallon excluding water and exempt solvents. Miscellaneous metal parts and metal furniture are defined in OAC rule 3745-21-01.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 5,040

gallons based upon a rolling, 12-month summation of the monthly coating usage rates.

To ensure federal enforceability during the first 12 calendar months of operation, the permittee shall not exceed the cumulative coating usage rates specified in the following table:

Maximum Allowable Cumulative Coating Usage (gallons)

Month(s)	Gallon Usage
1-1	1,000
1-2	2,000
1-3	3,000
1-4	4,000
1-12	5,040

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

2. The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall collect and record the following each month for coating usage in this emission unit:
 - a. the company name and identification for each coating employed;
 - b. identification of the material that the coating in C.1.a is being applied to (i.e. metal furniture or miscellaneous metal parts);
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. the VOC content of each coating, as applied, in lbs/gallon;

- e. the number of gallons of each coating employed;
 - f. the total number of gallons of all the coatings employed (summation of C.1.e for all coatings);
 - g. the VOC emission rate for each coating employed (C.1.d x C.1.e), in pounds;
 - h. the total VOC emission rate for all coatings employed (summation of C.1.g for all coatings), in pounds;
 - i. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total VOC emissions, in tons;
 - j. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month VOC emission rate, in tons;
 - k. for the first 12 months of operation, following the issuance of this permit, the cumulative coatings usage rate, in gallons; and
 - l. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month coating usage rate, in gallons.
2. The permittee shall collect and record the following each month for cleanup operations in this emission unit:
- a. the company name and identification for each cleanup material employed;
 - b. the VOC content of each cleanup material employed, in lbs/gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the VOC emission rate for each cleanup material employed (C.2.b x C.2.c), in pounds;
 - e. the total VOC emission rate for all cleanup materials employed (summation of C.2.d for all cleanup materials), in pounds;
 - f. the annual year to date VOC emissions from the cleanup operations, in tons per year (summation of C.2.e for each calendar month to date from January to December).

3. The Permit to Install for this emissions units was evaluated based on the actual materials (typically coating materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the Screen3 model. The predicted 1-hour maximum ground-level concentration from the use of the Screen3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Ethylene glycol mono butyl ether (2-Butoxyethanol [EGBE])

TLV (ug/m³): 96,663

Maximum Hourly Emission Rate (lbs/hr): 1.693

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2093

MAGLC (ug/m³): 2301.5

4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
 - a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

5. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
6. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. All exceedances of the rolling, 12-month VOC emission limitation of 8.82 tons.
 - b. All exceedances of the monthly VOC emission limitation of 58.80 pounds from the cleanup operations.
 - c. All exceedances of the rolling, 12-month coatings usage restriction of 5,040 gallons.
 - d. For the first 12 calendar months of operation following the issuance of this

permit, all exceedances of the maximum allowable cumulative coatings usage rates specified in section B.1.

These reports shall be submitted in accordance with the general terms and conditions of this permit.

2. The permittee shall notify the Director (the Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings for the following:
 - a. coatings that exceed the 3.00 lbs of VOC/gallon excluding water and exempt solvents when coating metal furniture.
 - b. coatings that exceed the 3.50 lbs of VOC/gallon excluding water and exempt solvents when coating miscellaneous metal parts.

The notifications shall include a copy of such record and shall be sent to the Director (the Northwest District Office) within 30 days following the end of the calendar month.

3. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

E. Testing Requirements

1. Compliance with the emission limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation:
7.00 pounds VOC per hour for coating operations

Applicable Compliance Method:

The hourly allowable VOC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (2 gallons per hour) by the maximum VOC content of all the coatings (3.50 pounds per gallon).

If required, the permittee shall demonstrate compliance with the hourly allowable

VOC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

- b. Emission Limitation:
8.82 tons VOC per rolling, 12-month period, from coating operations
- Applicable Compliance Method:
Compliance shall be based on the record keeping requirements as specified in C.1 of this permit.
- c. Emission Limitation:
The maximum annual coatings usage rate shall not exceed 5,040 gallons, based upon a rolling, 12-month summation of the monthly coatings usage rates.
- Applicable Compliance Method:
Compliance with the annual allowable coatings usage restriction above shall be based upon the record keeping requirements specified in section C.1 of this permit.
- d. Emission Limitation:
58.8 lbs VOC per month, 0.35 tons VOC per year from cleanup operations
- Applicable Compliance Method:
Compliance with the monthly allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section C.2 of this permit.

Emissions Unit ID: **K002**

- e. Emission Limitation:
 3.00 pounds VOC per gallon of coating, excluding water and exempt solvents when coating metal furniture
- Applicable Compliance Method:
 Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.
- f. Emission Limitation:
 3.50 pounds VOC per gallon of coating, excluding water and exempt solvents when coating miscellaneous metal parts
- Applicable Compliance Method:
 Compliance with the VOC content limitation above shall be based upon the record keeping requirements specified in section C.1 of this permit. Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the coatings.
- g. Emission Limitation:
 0.14 pounds PE per hour; 0.17 tons PE per year
- Applicable Compliance Method:
 The permittee may calculate actual PE rate from the unit utilizing the following equation:
- $$E = (\text{maximum coating solids usage rate}) \times (1-TE) \times (1-CE)$$
- where:
- $$E = \text{PE rate (pounds/hour)}.$$
- maximum coating solids usage rate = (highest density of coating)X(highest solids content in %)X(2 gallons per hour)
- TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used where in this case it is 75%.
- CE = Control efficiency of the control equipment (paint booth filters) considered

at 90%.

If required, compliance with the hourly PE limitation shall be determined in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

The annual allowable PE limitation was developed by multiplying the annual material usage limitation with the highest solids pound per gallon of coating, and then dividing by 2000. Therefore, if compliance is shown with the hourly material usage limitation, compliance is shown with the annual limitation.

- h. Emission Limitation:
Visible particulate emissions shall not exceed 0% opacity, as a six-minute average

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

F. Miscellaneous Requirements

None