Synthetic Minor Determination and/or ☐ Netting Determination

Permit To Install: 03-17336

A. Source Description

Custom Hardwoods is proposing to locate a furniture manufacturing operation in Richland County. The furniture manufacturing operation will consist of a single coating booth operation used to employ stains, laquer, enamel, etc.

B. Facility Emissions and Attainment Status

The potential to emit for total HAPs from this proposed facility is 7.3 tons. The 7.3 tons is based on the federally enforceable limit of 40 lbs OC/day under OAC rule 3745-21-07(G)(2). The company has requested federally enforceable limitations on HAPs such that when OAC rule 3745-21-07(G)(2) is rescinded the potential for HAPs at the facility will remain below 10 tons for each individual HAP and 25 tons for combined HAPs.

C. Source Emissions

See B. above

D. Conclusion

The establishment of synthetic minor limitations on HAPs will allow this facility to remain as a minor for HAPs when OAC rule 3745-21-07(G)(2) is rescinded.

State of Ohio Environmental Protection Agency

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

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

Application No: 01-01324
Fac ID: 0125040057

DATE: 9/18/2007

Delphi Safety and Interior Systems
Cliff Nunn
200 Georgesville Road
Columbus, OH 43228

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$1600** will be due. Please do not submit any payment now.

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

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **CDO** **MID-OH REG PLANNING COMM**

DRAFT PERMIT TO INSTALL 01-01324

Application Number:	01-01324
Facility ID:	0125040057
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Delphi Safety and Interior Systems
Person to Contact:	Cliff Nunn
Address:	200 Georgesville Road Columbus, OH 43228

Location of proposed air contaminant source(s) [emissions unit(s)]:
200 Georgesville Road
Columbus, Ohio

Description of proposed emissions unit(s):
3 Industrial Boilers and 2 coating booths.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

_____

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. 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.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

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

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the

permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be <u>obtained before</u> the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(s) covered by this permit.

11. 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.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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

3. 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.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

6. 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.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. 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.

Delphi Safety and Interior Systems **Facility ID: 0125040057**
PTI Application: 01-01324
Issued: To be entered upon final issuance

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit hard copy items to **Permitting**, DAPC, Central Office, and electronic files to **airpti@epa.state.oh.us**

Please fill out the following. If the checkbox does not work, replace it with an 'X'	Electronic	**Additional information** File Name Convention (your PTI # plus this letter)	Hard Copy	None
Calculations (required)	☒	**0317336c**.wpd	☐	
Modeling form/results	☒	0317336**s**.wpd	☐	☐
PTI Application (complete or partial)*	☐	0000000**a**.wpd	☐	☒
BAT Study	☐	0000000**b**.wpd	☐	☒
Other/misc.	☐	0000000**t**.wpd	☐	☒

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

Wood working facility with coating operations (R001). Worst case coating is "45/50 Urethane Lacquer" = 5.79 lbs OC/gal. Facility would trigger TV for HAPs if run 8760 hrs/yr.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

☐

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:
NONE

Please complete:

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

Pollutant	**Tons Per Year**
OC	7.3
PE	2.4

Emissions Unit ID: **R001**

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - *(R001) - Binks spray booth for miscellaneous wood parts coating operations with dry filtration*

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See A.2.a.
OAC 3745-31-05(C)	9.9 tons per rolling, 12- month period for any individual Hazardous Air Pollutant (HAP) and 24.9 tons per rolling, 12-month period for any combination of HAPs for emissions unit R001 (See A.2.b)
OAC 3745-21-07(G)(2)	8 lbs organic compounds/hr, 40.0 lbs OC/day from coating operations
OAC 3745-17-11(B)	0.551 pound particulate emissions (PE) per hour
OAC 3745-17-07(A)	Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
OAC rule 3745-114-01 ORC 3704.03(F)	See C.4 through C.6.

2. Additional Terms and Conditions

2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to organic compounds/volatile organic compounds (OC/VOC) emissions from this air contaminant source since the calculated annual emission rate for organic compounds (OC)* is less than ten tons per year taking into account the federally enforceable rule limit of 40 pounds of OC per day under OAC rule 3745-21-07(G)(2).

*For purposes of federal enforceability a limit on OC effectively restricts VOC.

2.b Annual HAP emissions from emissions units R001 shall not exceed 9.9 tons per rolling 12-month period for an individual HAP and 24.9 tons per rolling 12-month period for any combination of HAPs.

This emissions unit has been in operation for more than 12 months, and as

such, the permittee has existing records to determine compliance upon issuance of this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit. required to demonstrate compliance with this limitation.

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

The permittee has requested federally enforceable limitations on HAPs such that when OAC rule 3745-21-07(G)(2) is rescinded, the potential to emit for HAPs from the facility will remain below 10 tons per year for each individual HAP and 25 tons per year for combined HAPs.

B. Operational Restrictions

1. The permittee shall operate the dry filtration system whenever the unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. 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.

2. The permittee shall collect and record the following information each day for all coatings and cleanup material employed in this emissions unit:

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

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

   c. the OC content of each coating and cleanup material, as applied, in pounds per gallon;

   d. the OC emissions from each coating and cleanup material employed, in pounds (C.2.b. x C.2.c), in pounds;

   e. the total OC emission rate for all coatings and cleanup material employed (summation of C.2.d for all coatings), in pounds;

   f. the total number of hours the emissions unit was in operation;

g. the average hourly OC emission rate for all the coatings and cleanup materials employed (C.2.e/C.2.f), in pounds per hour (average)

h. the annual year to date OC emissions from coating operations, in tons per year (summation of C.4.e for each calendar day to date from January to December).

3. The permittee shall collect and record the following information regarding HAP emissions each month for emissions units R001:

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

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

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

   d. the emission rate for each individual HAP from each coating and cleanup material employed (C.4.b x C.4.c) for each individual HAP, in pounds;

   e. the total emission rate for each individual HAP from all the coatings and cleanup materials employed (for each individual HAP, the summation of C.4.d for all coatings and cleanup materials), in pounds;

   f. the total HAP emission rate for all HAPs combined from all the coatings and cleanup materials employed (summation of C.4.e for all HAPs for all coatings and cleanup materials), in pounds;

   g. following the issuance of this permit, the rolling, 12-month emissions of each individual HAP and all HAPs combined, in tons.

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

   Pollutant: Toluene

TLV: 50 ppm
Maximum Hourly Emission Rate (lbs/hr): 1.52
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2276.9
MAGLC (ug/m3): 4485.8

Pollutant: MEK
TLV: 200 ppm
Maximum Hourly Emission Rate (lbs/hr): 2.64
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3954.72
MAGLC (ug/m3): 14042.7

Pollutant: n-Butyl Acetate
TLV: 150 ppm
Maximum Hourly Emission Rate (lbs/hr): 2.0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2996
MAGLC (ug/m3): 16967.5

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

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

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

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

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

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

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

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

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

D. Reporting Requirements

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

   a. an identification of each day during which the average hourly organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day;

   b. an identification of each day during which the organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day; and

   c. All exceedances of the rolling, 12-month individual HAP and combined HAPs emission limitations of 9.9 tons and 24.9 tons.

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

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) 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 Ohio EPA District Office) within 30 days of the event.

E. Testing Requirements

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

   a. Emission Limitations:
   8.0 lbs OC/hr and 40 lbs OC/day

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

   b. Emission Limitations:
   9.9 tons per rolling, 12- month period for any individual HAP and 24.9 tons per rolling, 12-month period for any combination of HAPs for emission unit R001.

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

   c. Emission Limitation:
   0.551 pound PE per hour (per individual coating operation)

   Applicable Compliance Method:
   To determine the actual worst case PE rate (E), the following equation shall be used for each individual coating operations:

   E = PE rate (lbs/hr)

   E = maximum coating solids usage rate, in pounds per hour (1-TE) x (1-CE)

   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 (assumed to be 40%)

CE = control efficiency of the control equipment (established at 99%)

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC rule 3745-17-03(B)(10).

d. Emission Limitation:
Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:
If required, compliance shall be determine in accordance with OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

1. The terms and conditions contained in Part II, A.1 through E.1 are federally enforceable.

2 **NEW SOURCE REVIEW FORM B**

PTI Number: 03-17336 Facility ID: 0370010310

FACILITY NAME Custom Hardwoods

FACILITY DESCRIPTION Binks spray booth for misc. wood parts CITY/TWP Mansfield

Emissions Unit ID: **R001**

SIC CODE 3553 SCC CODE 4-02-001-10 EMISSIONS UNIT ID R001

EMISSIONS UNIT DESCRIPTION Binks spray booth for miscellaneous wood parts coating operations.

DATE INSTALLED upon issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	Attainment	8.0 lbs/hr; 40 lbs/day	7.3	8.0 lbs/hr; 40 lbs/day	7.3
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
BAT is not applicable due to SB 265

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES ____ NO

IDENTIFY THE AIR CONTAMINANTS: Toluene, MEK, n-butyl acetate