State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL **CERTIFIED MAIL**
COSHOCTON COUNTY

Street Address:
50 West Town Street, Suite 700
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

Application No: 06-08152
Fac ID: 0616010089
DATE: 1/18/2007

Hill Finishing
Ervin Yoder
32795 T.R. 219
Millersburg, OH 44654

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 of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

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

CC: **USEPA** **SEDO**

FINAL PERMIT TO INSTALL 06-08152

Application Number:	06-08152
Facility ID:	0616010089
Permit Fee:	**$1200**
Name of Facility:	Hill Finishing
Person to Contact:	Ervin Yoder
Address:	32795 T.R. 219 Millersburg, OH 44654

Location of proposed air contaminant source(s) [emissions unit(s)]:
32795 TR 219
Millersburg, **Ohio**

Description of proposed emissions unit(s):
Sealer booth, topcoat booth and diesel engine for wood finishing operation.

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

Laura Powell
Acting 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 (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. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
PE	0.77
SO2	0.72
NOx	10.86
CO	2.34
VOC	25.88

Issued: 1/18/2007

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 - (P001) - 80 HP John Deere Diesel Engine

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	0.77 TPY of particulate emissions (PE). 0.16 lb/hr and 0.72 TPY of sulfur dioxide (SO2). See B.1. below. 2.48 lbs/hr and 10.86 TPY of nitrogen oxides (NOx). 0.53 lb/hr and 2.34 TPY of carbon monoxide (CO). 0.20 lb/hr and 0.88 TPY of volatile organic compounds (VOC). Visible particulate emissions from the stack serving this emissions unit shall not exceed 10% opacity, as a six-minute average. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(B)(5)(a).
OAC rule 3745-17-11(B)(5)(a)	0.25 lb PE per million Btu of actual heat input. See A.2.a and A.2.b below.
OAC rule 3745-17-07(A)(1)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-18-06(G)	This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).
OAC rule 3745-21-08(B)	See A.2.c below.
OAC rule 3745-23-06(B)	See A.2.d below.

2. Additional Terms and Conditions

2.a The requirement to comply with this particulate emission limitation shall terminate on the date the U.S. EPA approves the 0.310 lb PE per million Btu of actual heat input emission limitation as a revision to the Ohio SIP for particulate matter.

2.b This particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.

2.c The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.d The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On February 14, 2005, OAC rule 3745-23-06 was rescinded; therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revision, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

B. Operational Restrictions

1. The permittee shall only burn No.2 or diesel fuel, containing no greater than 0.5 percent sulfur by weight, in this emissions unit.

Emissions Unit ID: **P001**

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the sulfur content of all fuels received for use in this emissions unit.

2. For each day during which the permittee burns a fuel other than No. 2 or diesel fuel containing no greater than 0.5 percent sulfur by weight in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day during which a fuel other than No.2 or diesel fuel containing no greater than 0.5 percent sulfur by weight was burned in this emissions unit. Each report shall be submitted within 30 days of the deviation.

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:
   0.77 TPY of PE.

   Applicable Compliance Methods:
   Compliance with the annual emission limitation above shall be determined by multiplying 0.0022 lb/hp-hr, the emission factor specified in AP-42 "Compilation of Air Pollutant Emission Factors," Table 3.3-1 (10/96), by 80 HP, the power output rating of this unit, and by the maximum hours of operation, 8760 hours/year, and dividing by 2,000 lbs/ton.

   b. Emission Limitations:
   0.16 lb/hr and 0.72 TPY of SO2.

   Applicable Compliance Methods:
   Compliance with the hourly emission limitation above shall be determined by multiplying 0.00205 lb/hp-hr, the emission factor specified in AP-42 "Compilation of Air Pollutant Emission Factors," Table 3.3-1 (10/96), by 80 HP, the power output rating of this unit.

If required, compliance with the hourly emission limitation shall be demonstrated based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate above by the maximum hours of operation, 8760 hours/year, and dividing by 2,000 lbs/ton.

c. Emission Limitations:
2.48 lbs/hr and 10.86 TPY of NOx

Applicable Compliance Methods:
Compliance with the hourly emission limitation above shall be determined by multiplying 0.031 lb/hp-hr, the emission factor specified in AP-42 "Compilation of Air Pollutant Emission Factors," Table 3.3-1 (10/96), by 80 HP, the power output rating of this unit.

If required, compliance with the hourly emission limitation shall be demonstrated based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate above by the maximum hours of operation, 8760 hours/year, and dividing by 2,000 lbs/ton.

d. Emission Limitations:
0.53 lb/hr and 2.34 TPY of CO.

Applicable Compliance Methods:
Compliance with the hourly emission limitation above shall be determined by multiplying 0.00668 lb/hp-hr, the emission factor specified in AP-42 "Compilation of Air Pollutant Emission Factors," Table 3.3-1 (10/96), by 80 HP, the power output rating of this unit.

If required, compliance with the hourly emission limitation shall be demonstrated based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate above by the maximum hours of operation,

8760 hours/year, and dividing by 2,000 lbs/ton.

e. Emission Limitations:
0.20 lb/hr and 0.88 TPY of VOC.

Applicable Compliance Methods:
Compliance with the hourly emission limitation above shall be determined by multiplying 0.00251 lb/hp-hr, the emission factor specified in AP-42 "Compilation of Air Pollutant Emission Factors," Table 3.3-1 (10/96), by 80 HP, the power output rating of this unit.

If required, compliance with the hourly emission limitation shall be demonstrated based upon emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25A.

Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate above by the maximum hours of operation, 8760 hours/year, and dividing by 2,000 lbs/ton.

f. Emission Limitation:
Visible particulate emissions from the stack serving this emissions unit shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method:
If required, compliance with this limitation shall be determined using Method 9 of 40 CFR, Part 60, Appendix A.

g. Emission Limitation:
0.310 lb PE per million Btu of actual heat input.

Applicable Compliance Method:
Compliance shall be demonstrated using the emission factor of 0.31 lb PE per million Btu of actual heat input from AP-42, Table 3.3-1 (Gasoline and Diesel Industrial Engines, 10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

h. Emission Limitation:

Emissions Unit ID: **P001**

0.25 lb PE per million Btu of actual heat input.

Applicable Compliance Method:
The permittee cannot demonstrate compliance with this emission limitation based upon the current emission factor contained in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96). The Ohio EPA revised the emission limitation specified in this rule citation based upon the currently applicable emission factor. The revised rule was adopted by the Director of Ohio EPA in December of 1997, and it will be submitted to the U.S. EPA as a proposed revision to the Ohio SIP for particulate matter. When the SIP revision is approved by the U.S. EPA, the 0.25 lb PE per million Btu of actual heat input emission limitation will no longer be applicable, and the permittee will be able to demonstrate compliance with the new emission limitation (0.310 lb PE per million Btu of actual heat input) using the current emission factor.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

F. Miscellaneous Requirements

None

Issued: 1/18/2007

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) - Sealer Booth Vented Through Dry Filters

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions from all the coatings and cleanup materials for this emissions unit shall be less than 25.0 tons per year. See A.2.b , A.2.c, B.1, and B.2 below. The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2).
OAC rule 3745-31-05(C) Synthetic Minor to Avoid Title V and MACT Applicability	See A.2.d and A.2.e below.
OAC rule 3745-21-07(G)(2)	See A.2.a below.

2. Additional Terms and Conditions

2.a Each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and from photochemically reactive cleanup or thinner materials shall not exceed 8 pounds per hour and 40 pound per day. OC emissions from clean up material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

2.b On any day during which no photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are employed, the VOC emissions from all the coatings shall not exceed 19.7 pounds per hour. [This limit is based upon the maximum application rate of 3.3 gallons per hour.]

Emissions Unit ID: **R001**

2.c The isobutyl acetate content of each coating shall not exceed 2.11 pounds per gallon, as applied.

2.d The VOC emissions from all the coatings and cleanup materials for emissions units R001, R002, and Z001 (Stain Booth), combined, shall be less than 25.0 tons per rolling, 12-month period.

2.e The content of any single hazardous air pollutant (HAP)[1] in any coating or cleanup material shall not exceed 36 percent, by weight, of the VOC portion of the coating or cleanup material, as applied. The content of the combined HAPs in any coating or cleanup material shall not exceed 96 percent, by weight, of the VOC portion of the coating or cleanup material, as applied.

[1] A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials.

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.

2. The hours of operation of this emissions unit shall not exceed 161 hours per week.

3. The weight of organic material in solvent evaporated (solvent usage), which is equivalent to VOC emissions, shall be less than 25.0 tons during any rolling, 12-month period from emissions units R001, R002, and Z001 combined.

   Compliance with this limitation shall be based upon a rolling, 12-month summation of facility-wide solvent usage, calculated monthly, using the following equation:

   Solvent Usage = [Summation (pounds of coatings employed x solvent content of coatings in percent VOC by weight) + (pounds of cleanup solvent employed) for all calendar months] x 0.0005 ton per pound

   The permittee has sufficient monthly records of solvent usage and VOC emissions to begin calculating the rolling, 12-month summations upon final issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.

2. The permittee shall collect and record the following information for each day during which any photochemically reactive material is employed in this emissions unit:

   a. the company identification for each coating and photochemically reactive cleanup material employed;

   b. the number of gallons of each coating and photochemically reactive cleanup material employed minus the number of gallons of each coating and photochemically reactive cleanup material recovered for disposal;

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

   d. the total emissions rate for all the coatings and photochemically reactive cleanup materials, in pounds OC per day;

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

   f. the average hourly OC emission rate for all the coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);

   g. the VOC content of each coating and photochemically reactive cleanup material, in pounds VOC per gallon; and

   h. the total emissions rate for all coatings and photochemically reactive cleanup materials, in pounds VOC per day.

   [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information for each day during which no photochemically reactive materials are employed in this emissions unit:

   a. the company identification for each coating or cleanup material employed;

   b. documentation on whether or not each material employed (coating and cleanup)

was a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);

c. the VOC content of each coating, in lbs/gallon, as applied;

d. the number of gallons of each coating employed minus the number of gallons of each coating recovered for disposal;

e. the total VOC emissions from all the coatings employed, in lbs/day, i.e., sum of (c) times (d);

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

g. the average hourly VOC emission rate for all the coatings, i.e., (e)/(f), in lbs/hr.

4. The permittee shall collect and record the following information for each month for the emissions unit:

a. the number of gallons of each non-photochemically reactive cleanup material employed minus the number of gallons of cleanup material recovered for disposal;

b. the VOC content of each non-photochemically cleanup material, in lbs/gallon;

c. the total VOC emissions from all non-photochemically reactive cleanup materials employed, in lbs/month, i.e., sum of (b) times (a);

d. the actual VOC emissions from all the coatings and cleanup materials employed, in tons [i.e., (the summation of the daily VOC emissions, from section C.2.h, for the calendar month + the summation of the daily VOC emissions, from section C.3.e, for the calendar month + the monthly non-photochemically reactive cleanup material VOC emission from section C.4.c) divided by 2000 lbs/ton]; and

e. the rolling, 12-month summation of total VOC emissions from all the coatings and cleanup materials employed in emissions units R001, R002, and Z001 combined (calculated by adding the current month's VOC emissions to the VOC emissions for the preceding 11 months).

5. The permittee shall calculate and record the total VOC emissions for all the coatings and cleanup materials employed, in tons, for each calendar year from this emissions

unit.

6. The permittee shall maintain records of the isobutyl acetate content of each coating, as applied, in pounds per gallon and the actual single HAP content and the combined HAPs content for each coating and cleanup material, in percent by weight of the VOC portion of the coating or cleanup material, as applied, (i.e., the pounds of HAP per gallon divided by the pounds of VOC per gallon).

7. The permittee shall record each week the total number of hours the emissions unit was in operation; i.e., sum of (2.e plus 3.f) for the week.

8. The permit to install for this emissions unit 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):

   Compound: isobutyl acetate

   TLV (mg/m3): 713

   Maximum Hourly Emission Rate (lbs/hr): 6.96 (emissions units combined)

   Predicted 1-Hour Maximum Ground-Level
   Concentration (ug/m3): 17124

   Adjusted MAGLC (ug/m3): 17705

9. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

10. 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

Emissions Unit ID: **R001**

1. The permittee shall notify the Director in writing of any daily record showing that the dry filters were 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 Ohio EPA, Southeast District Office within 30 days after the event occurs.

2. The permittee submit quarterly deviation reports that identify:

   a. for the days during which a photochemically reactive material was employed, each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such incidence;

   b. for the days during which a photochemically reactive material was not employed, each day during which the average VOC emissions from the coatings and cleanup materials exceeded 19.7 pounds per hour, and the actual average VOC emissions for each such day;

   c. any week during which the hours of operation of the emissions unit exceeded 161; and

   d. all exceedances of the isobutyl acetate, single HAP, and/or combined HAPs content limitations specified above for each coating or cleanup material, as applied, and the actual isobutyl acetate and/or HAP contents of each such coating or cleanup material.

   The quarterly reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

3. The permittee shall submit annual reports that summarize the actual annual VOC emissions from this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

4. The permittee shall notify SEDO, in writing, of any record showing that the rolling, 12-month summation of the VOC emissions from the coatings and cleanup materials from emissions units R001, R002, and Z001 combined were 25.0 tons or greater and the actual VOC emissions for each such 12-month period. The permittee shall identify the cause for the emission exceedance and any corrective action taken. The notification shall include a copy of such record and shall be sent to SEDO within 30 days after the event occurs.

E. Testing Requirements

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

   a. Emissions Limitation:
   8 pounds per hour of OC emissions for each day that photochemically reactive materials are employed.

   Applicable Compliance Method:
   Compliance shall be determined by the daily values calculated in C.2.f. based upon the record keeping specified in Section C.2.

   b. Emissions Limitation:
   40 pounds per day of OC emissions for each day that photochemically reactive materials are employed.

   Applicable Compliance Method:
   Compliance shall be determined by the daily values calculated in C.2.d. based upon the record keeping specified in Section C.2.

   c. Emissions Limitation:
   19.7 pounds VOC emissions per hour for each day that photochemically reactive materials are not employed.

   Applicable Compliance Method:
   Compliance shall be determined by the daily values calculated in C.3.g. based on the record keeping specified in Section C.3.

   d. Emissions Limitation:
   Less than 25.0 tons of VOC emissions per rolling, 12-month period from all coatings and cleanup material from emissions units R001, R002, and Z001 combined.

   Applicable Compliance Method:
   Compliance shall be determined by the value recorded in C.4.e. based on the record keeping as specified in Section C.2, C.3 and C.4.

   e. Emissions Limitation:
   The VOC emissions from all the coatings and cleanup materials for this emissions unit shall be less than 25.0 tons per year.

Emissions Unit ID: **R001**

Applicable Compliance Method:
Compliance shall be determined by the value recorded in C.5. based on the record keeping as specified in Section C.2, C.3 and C.4.

2. USEPA Method 24 or formulation data shall be used to determine the VOC contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

None

Issued: 1/18/2007

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 - (R002) - Topcoat Booth Vented Through Dry Filters

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	The volatile organic compound (VOC) emissions from all the coatings and cleanup materials for this emissions unit shall be less than 25.0 tons per year. See A.2.b , A.2.c, B.1, and B.2 below. The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2).
OAC rule 3745-31-05(C) Synthetic Minor to Avoid Title V and MACT Applicability	See A.2.d and A.2.e below.
OAC rule 3745-21-07(G)(2)	See A.2.a below.

2. Additional Terms and Conditions

2.a Each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and from photochemically reactive cleanup or thinner materials shall not exceed 8 pounds per hour and 40 pound per day. OC emissions from clean up material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

2.b On any day during which no photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are employed, the VOC emissions from all the coatings shall not exceed 19.7 pounds per hour. [This limit is based upon the maximum application rate of 3.3 gallons per hour.]

2.c The isobutyl acetate content of each coating shall not exceed 2.11 pounds per gallon, as applied.

2.d The VOC emissions from all the coatings and cleanup materials for emissions units R001, R002, and Z001 (Stain Booth), combined, shall be less than 25.0 tons per rolling, 12-month period.

2.e The content of any single hazardous air pollutant (HAP)[1] in any coating or cleanup material shall not exceed 36 percent, by weight, of the VOC portion of the coating or cleanup material, as applied. The content of the combined HAPs in any coating or cleanup material shall not exceed 96 percent, by weight, of the VOC portion of the coating or cleanup material, as applied.

[1] A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials.

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.

2. The hours of operation of this emissions unit shall not exceed 161 hours per week.

3. The weight of organic material in solvent evaporated (solvent usage), which is equivalent to VOC emissions, shall be less than 25.0 tons during any rolling, 12-month period from emissions units R001, R002, and Z001 combined.

   Compliance with this limitation shall be based upon a rolling, 12-month summation of facility-wide solvent usage, calculated monthly, using the following equation:

   Solvent Usage = [Summation (pounds of coatings employed x solvent content of coatings in percent VOC by weight) + (pounds of cleanup solvent employed) for all calendar months] x 0.0005 ton per pound

   The permittee has sufficient monthly records of solvent usage and VOC emissions to begin calculating the rolling, 12-month summations upon final issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

Emissions Unit ID: **R002**

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.

2. The permittee shall collect and record the following information for each day during which any photochemically reactive material is employed in this emissions unit:

   a. the company identification for each coating and photochemically reactive cleanup material employed;

   b. the number of gallons of each coating and photochemically reactive cleanup material employed minus the number of gallons of each coating and photochemically reactive cleanup material recovered for disposal;

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

   d. the total emissions rate for all the coatings and photochemically reactive cleanup materials, in pounds OC per day;

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

   f. the average hourly OC emission rate for all the coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);

   g. the VOC content of each coating and photochemically reactive cleanup material, in pounds VOC per gallon; and

   h. the total emissions rate for all coatings and photochemically reactive cleanup materials, in pounds VOC per day.

   [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

3. The permittee shall collect and record the following information for each day during which no photochemically reactive materials are employed in this emissions unit:

   a. the company identification for each coating or cleanup material employed;

   b. documentation on whether or not each material employed (coating and cleanup)

was a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);

c. the VOC content of each coating, in lbs/gallon, as applied;

d. the number of gallons of each coating employed minus the number of gallons of each coating recovered for disposal;

e. the total VOC emissions from all the coatings employed, in lbs/day, i.e., sum of (c) times (d);

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

g. the average hourly VOC emission rate for all the coatings, i.e., (e)/(f), in lbs/hr.

4. The permittee shall collect and record the following information for each month for the emissions unit:

a. the number of gallons of each non-photochemically reactive cleanup material employed minus the number of gallons of cleanup material recovered for disposal;

b. the VOC content of each non-photochemically cleanup material, in lbs/gallon;

c. the total VOC emissions from all non-photochemically reactive cleanup materials employed, in lbs/month, i.e., sum of (b) times (a);

d. the actual VOC emissions from all the coatings and cleanup materials employed, in tons [i.e., (the summation of the daily VOC emissions, from section C.2.h, for the calendar month + the summation of the daily VOC emissions, from section C.3.e, for the calendar month + the monthly non-photochemically reactive cleanup material VOC emission from section C.4.c) divided by 2000 lbs/ton]; and

e. the rolling, 12-month summation of total VOC emissions from all the coatings and cleanup materials employed in emissions units R001, R002, and Z001 combined (calculated by adding the current month's VOC emissions to the VOC emissions for the preceding 11 months).

5. The permittee shall calculate and record the total VOC emissions for all the coatings and cleanup materials employed, in tons, for each calendar year from this emissions

unit.

6. The permittee shall maintain records of the isobutyl acetate content of each coating, as applied, in pounds per gallon and the actual single HAP content and the combined HAPs content for each coating and cleanup material, in percent by weight of the VOC portion of the coating or cleanup material, as applied, (i.e., the pounds of HAP per gallon divided by the pounds of VOC per gallon).

7. The permittee shall record each week the total number of hours the emissions unit was in operation; i.e., sum of (2.e plus 3.f) for the week.

8. The permit to install for this emissions unit 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):

Compound: isobutyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 6.96 (emissions units combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 17124

Adjusted MAGLC (ug/m3): 17705

9. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

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

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

D. Reporting Requirements

1. The permittee shall notify the Director in writing of any daily record showing that the dry filters were 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 Ohio EPA, Southeast District Office within 30 days after the event occurs.

2. The permittee submit quarterly deviation reports that identify:

    a. for the days during which a photochemically reactive material was employed, each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such incidence;

    b. for the days during which a photochemically reactive material was not employed, each day during which the average VOC emissions from the coatings and cleanup materials exceeded 19.7 pounds per hour, and the actual average VOC emissions for each such day; and

    c. any week during which the hours of operation of the emissions unit exceeded 161; and

d. all exceedances of the isobutyl acetate, single HAP, and/or combined HAPs content limitations specified above for each coating or cleanup material, as applied, and the actual isobutyl acetate and/or HAP contents of each such coating or cleanup material.

The quarterly reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

3. The permittee shall submit annual reports that summarize the actual annual VOC emissions from this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

4. The permittee shall notify SEDO, in writing, of any record showing that the rolling, 12-month summation of the VOC emissions from the coatings and cleanup materials from emissions units R001, R002, and Z001 combined were 25.0 tons or greater and the actual VOC emissions for each such 12-month period. The permittee shall identify the cause for the emission exceedance and any corrective action taken. The notification shall include a copy of such record and shall be sent to SEDO within 30 days after the event occurs.

E. Testing Requirements

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

a. Emissions Limitation:
8 pounds per hour of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.f. based upon the record keeping specified in Section C.2.

b. Emissions Limitation:
40 pounds per day of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.d. based upon the record keeping specified in Section C.2.

c. Emissions Limitation:
19.7 pounds VOC emissions per hour for each day that photochemically reactive materials are not employed.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.3.g. based on the record keeping specified in Section C.3.

d. Emissions Limitation:
Less than 25.0 tons of VOC emissions per rolling, 12-month period from all coatings and cleanup material from emissions units R001, R002, and Z001 combined.

Applicable Compliance Method:
Compliance shall be determined by the value recorded in C.4.e. based on the record keeping as specified in Section C.2, C.3 and C.4.

e. Emissions Limitation:
The VOC emissions from all the coatings and cleanup materials for this emissions unit shall be less than 25.0 tons per year.

Applicable Compliance Method:
Compliance shall be determined by the value recorded in C.5. based on the record keeping as specified in Section C.2, C.3 and C.4.

2. USEPA Method 24 or formulation data shall be used to determine the VOC contents of the coatings and cleanup materials.

F. Miscellaneous Requirements

None