☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install: **06-08296**

A. Source Description

Wood finishing operation including sealer booth, topcoat booth, stain booth, air make-up unit (exempt), and diesel engine. The stain booth was previously deminimus but is now projected to have a PTE > 10 lb/day and is therefore the subject of this permit action. It will remain part of the existing synthetic minor and complies with toxics modeling.

B. Facility Emissions and Attainment Status

The facility is located in an attainment area. Based on potential to emit, the facility would be a major source for VOC and HAP. Since the area source exemption criteria in 40 CFR Part 63, Subpart JJ, is met (63.800(b)(3)), the facility is not currently subject to the MACT requirements and, therefore, is able to obtain synthetic minor limitations to avoid future MACT applicability. The synthetic minor limitations would allow the facility to increase HAP emissions above the area source thresholds provided in the MACT rule without becoming subject to the MACT requirements, since emissions are limited to below the MACT major source thresholds for a single HAP and combination of HAPs.

C. Source Emissions

To avoid being a major source and establish a BAT determination consistent with being subject to BAT based on OAC rule 3745-21-15, a combined VOC emissions limit of less than 25.0 tpy VOC for all coating booths is included in the PTI. This limit will also prevent the facility from being a major source of HAP through a limitation on the maximum percentage of HAP/VOC content. If the HAP content of the coating, as applied, does not exceed the limits of 36% and/or 96% of the VOC portion by weight, then the facility can never exceed 9.0 TPY single HAP and/or 24.0 TPY of combined HAPs (calculate by dividing the lbs/gal HAP by lbs/gal VOC).

D. Conclusion

The synthetic minor limitations proposed in the draft PTI will limit emissions below major source thresholds for VOC and HAP and ensure compliance with the Ohio EPA air toxics policy.

State of Ohio Environmental Protection Agency

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

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

Application No: 06-08296
Fac ID: 0616010089

DATE: 6/5/2007

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

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 **$200** 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** **SEDO** **WV**

COSHOCTON COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **06-08296** FOR AN AIR CONTAMINANT SOURCE
FOR **Hill Finishing**

On 6/5/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Hill Finishing**, located at **32795 TR 219, Millersburg**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-08296:

Stain booth stack with exhaust fan and air assisted airless spray pump gun.

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

Bruce Weinberg, Ohio EPA, Southeast District Office, 2195 Front Street, Logan, OH 43138
[(740)385-8501]

DRAFT PERMIT TO INSTALL 06-08296

Application Number:	06-08296
Facility ID:	0616010089
Permit Fee:	**To be entered upon final issuance**
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):
Stain booth stack with exhaust fan and air assisted airless spray pump gun.

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

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
VOC	25 (facility)
Single HAP	9.0
Total HAP	24.0

Emissions Unit ID: **R003**

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 - R003 - Stain 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 and B.1 below. The requirements of this rule also include compliance with requirements of OAC rule 3745-31-05(C), ORC 3704.03(F)(4)(c) and 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.c and A.2.d below.
ORC 3704.03(F)(4)(c) and OAC Rule 3745-114	See C.7 through C.9 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 14.0 pounds per hour. [This limit is based upon the maximum application rate of 2.2 gallons per hour.]

2.c The VOC emissions from all the coatings and cleanup materials for emissions units R001, R002, and R003, combined, shall be less than 25.0 tons per rolling, 12-month period.

2.d 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 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 weight of organic material in solvent evaporated (solvent usage, minus the number of gallons recovered for disposal), 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 R003 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 R003 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 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 permit to install for these emissions units, R001, R002 and R003, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee in the permit application. The Ohio EPA's "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration results from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

   a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour work week, for each toxic compound emitted from the emissions units (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

      i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

      ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

   b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

   c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

4 ~ { TLV OVER XY } ~ = ~ MAGLC

d. The following summarizes the results of dispersion modeling for the"worst case" toxic contaminant:

Compound: stoddard solvent

TLV (mg/m3): 572.6

Maximum Hourly Emission Rate (lbs/hr): 9.02 (emissions units combined)

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 5749

MAGLC (ug/m3): 13633

The permittee has demonstrated that emissions of stoddard solvent is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic contaminant in accordance with ORC 3704.03(F).

8. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC 3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification"

under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous permitted level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

9. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":

   a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

   b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03(F);

   c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

   d. the documentation of the initial evaluation of compliance with ORC 3704.03(F) and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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.

Emissions Unit ID: **R003**

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 14.0 pounds per hour, and the actual average VOC emissions for each such day; and

   c. all exceedances of the single HAP, and/or combined HAPs content limitations specified above for each coating or cleanup material, as applied, and the actual 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 R003 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.

Issued: To be entered upon final issuance

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:
   14.0 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 R003 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.C.2.

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