

Synthetic Minor Determination and/or Netting Determination

Permit To Install 06-07525

A. Source Description

Malta Wood Windows, Inc. is a wood door and window assembly facility located in Malta, Morgan County. K001 is a dip tank which will be used to manually apply solvent-based wood preservative to window and door frame parts prior to assembly. Coated parts are air-dried.

B. Facility Emissions and Attainment Status

Morgan County is currently in attainment for all criteria pollutants. The PTI application indicates a maximum hourly coating usage rate of 2.6 gallons/hr and a maximum OC content of 6.5 lb/gallon. This corresponds to a maximum annual coating usage rate of 22776 gal/yr and potential OC emissions of 16.9 lbs/hr and 74 TPY. Currently, K001 is the only emissions unit at this facility.

C. Source Emissions

The permittee has requested a maximum annual coating usage restriction of 500 gallons, which is equivalent to allowable OC emissions of 1.7 TPY. In order to make the requested limits federally enforceable, the 500 gallon coating usage restriction is being established as a rolling 12 month summation with associated monitoring, recordkeeping, and reporting requirements. The 16.9 lbs/hr OC emission limitation is being established as the potential to emit for K001. If any coating is employed with an OC content greater than 6.5 lbs/gal, the permittee will be required to submit a PTI modification application. Compliance with the 1.7 ton per 12 month period emission limitation is assumed as long as compliance is maintained with the coating usage restriction.

D. Conclusion

The terms and conditions included in this permit are adequate to ensure federal enforceability of the emissions limitations at a level below the emissions unit's potential to emit.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
MORGAN COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 06-07525

Fac ID: 0658000205

DATE: 8/12/2004

Malta Wood Windows Inc.
Terry McGrath
PO Box 250
Malta, OH 43758

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, 43266-0149.

A Permit to Install may be issued in proposed or 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

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL 06-07525 FOR AN AIR CONTAMINANT SOURCE FOR MALTA WOOD WINDOWS INC.

On 8/12/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Malta Wood Windows Inc.**, located at **210 13th St Bldg 15, Malta**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 06-07525:

Dip Tank.

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.

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



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 06-07525

Application Number: 06-07525
Facility ID: 0658000205
Permit Fee: **To be entered upon final issuance**
Name of Facility: Malta Wood Windows Inc.
Person to Contact: Terry McGrath
Address: PO Box 250
Malta, OH 43758

Location of proposed air contaminant source(s) [emissions unit(s)]:
**210 13th St Bldg 15
Malta, Ohio**

Description of proposed emissions unit(s):
Dip Tank.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Malta Wood Windows Inc.

Facility ID: 0658000205

PTI Application: 06-07525

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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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

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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

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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.

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14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	1.7

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - Wood preservative dip tank	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions shall not exceed 16.9 lbs/hr. See section A.2.b below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-07(G)(2).
	OAC rule 3745-31-05(C)	OC emissions shall not exceed 1.7 tons during any 12-month rolling period.
	OAC rule 3745-21-07(G)(2)	See Section B.1 below None (See Section B.2 below.)

2. Additional Terms and Conditions

- 2.a The hourly OC emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with this limit.
- 2.b The emissions unit shall be fitted with a cover that remains closed at all time when the dip tank is not in use.

B. Operational Restrictions

1. The permittee has requested a limitation on gallons of coatings employed for purposes of limiting potential to emit. Therefore, the maximum annual coating usage in emissions unit K001 shall not exceed 500 gallons based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the usage specified in the following table:

<u>Month(s)</u>	<u>Maximum Cumulative Gallons of Coatings</u>
1	100
1-2	200
1-3	300
1-4	400
1-5	500
1-6	500
1-7	500
1-8	500
1-9	500
1-10	500
1-11	500
1-12	500

After the first 12 calendar months of operation following the startup of emissions unit K001, compliance with the annual gallons of coatings limitation shall be based upon a rolling 12-month summation of the gallons of coatings employed.

2. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. the company identification for each coating employed;
 - b. the OC content of each coating, in pounds per gallon;
 - c. the total number of gallons of each coating employed;

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- d. during the first 12 calendar months of operation following the issuance of this permit, the cumulative gallons of coatings employed, calculated by adding the current month's coatings usage to the coatings usage for each calendar month since the issuance of this permit;
- e. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the gallons of coatings employed, calculated by adding the current month's coatings usage to the coatings usage for the preceding eleven calendar months; and
- f. documentation for each coating as to whether or not it is a photochemically reactive material as defined by OAC rule 3745-21-01(C)(5).

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify:
 - a. for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative gallons of coatings employed;
 - b. any exceedance of the rolling 12-month coatings usage limitation; and
 - c. any day a photochemically reactive material was employed in this emissions unit.

Each report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation:

OC emissions shall not exceed 16.9 lbs/hr.

Applicable Compliance Method:

Compliance with the hourly OC emission limitation shall be based upon the maximum coating usage and OC content, as shown in the following equation:

$$(2.6 \text{ gal/hr})(6.5 \text{ lbs OC/gal}) = 16.9 \text{ lbs/hr}$$

Malta**PTI A**Emissions Unit ID: **K001****Issued: To be entered upon final issuance**

Note: The permittee shall be required to submit a PTI application if the OC content of any coating employed in this emissions unit exceeds 6.5 lbs/gal.

b. Emission Limitation:

OC emissions shall not exceed 1.7 tons during any 12-month rolling period.

Applicable Compliance Method:

Compliance with this emission limitation shall be assumed provided that compliance is maintained with the rolling 12 month coating usage limitation. This emission limitation was calculated by multiplying the maximum OC content by the rolling 12 month coating usage limitation, and dividing by 2000 lb/ton.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound or OC content of each coating and cleanup material.

F. Miscellaneous Requirements

None.