



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
MUSKINGUM COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 06-06168

DATE: 1/8/2002

All American Homes Ohio LLC
David Johnson
4005 All American Way
Zanesville, OH 43701

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

SEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 1/8/2002
Effective Date: 1/8/2002**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 06-06168

Application Number: 06-06168
APS Premise Number: 0660010243
Permit Fee: **\$0**
Name of Facility: All American Homes Ohio LLC
Person to Contact: David Johnson
Address: 4005 All American Way
Zanesville, OH 43701

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4005 All American Way`
Zanesville, Ohio**

Description of proposed emissions unit(s):
Common home building equipment including woodworking equipment hand tools caulk guns and air assisted airless spray paint application equipment.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping 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 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

All American Homes Ohio LLC
PTI Application: 06-06168
Modification Issued: 1/8/2002

Facility ID: 0660010243

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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
Particulate	7.3
VOC	31.0

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>
F001 - Woodworking operations.	OAC rule 3745-31-05	There shall be no visible fugitive particulate emissions from the building. Total particulate emissions from F001 shall not exceed 4.9 tons per year.

2. Additional Terms and Conditions

- 2.a This facility is not located in an Appendix A area as described in OAC rule 3745-17-08; therefore, OAC rules 3745-17-07 and 3745-17-08 do not apply to the fugitive emissions from this emissions unit.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

The permittee shall perform daily checks for any visible particulate emissions from the exhaust of the fabric filter control system. The presence or absence of any visible emissions from the exhaust from the building shall be noted in an operations log. If any visible emissions are observed, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports that identify all days during which visible

All American Homes Ohio LLC

PTI Application: 06-06168

Modif

Facility ID: 0660010243

Emissions Unit ID: F001

particulate emissions are observed from the building.

The reports shall be submitted on:

- a. January 31 of each year and shall cover the period from July 1 until December 31; and,
- b. July 31 of each year and shall cover the period from January 1 until June 30.

If no visible particulate emissions are observed from the building during a given period, the permittee shall submit a report which states that no visible particulate emissions were observed from the building during that period. (These reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

E. Testing Requirements

1. Compliance with the no visible emissions limit shall be determined using Test Method 22-like visible emission observations. (Although Test Method 22 applies to fugitive emissions units, the visible/no visible emissions observation technique of Test Method 22 can be applied to ducted emissions, i.e., Test Method 22-like visible emission observations.)
2. Compliance with the particulate matter emission limit of 4.9 tons per year shall be determined in accordance with the following equation:

$$\text{tons PM/year} = (1.12 \text{ lbs / hr}) \times (8760 \text{ hr / yr}) \times (\text{tons} / 2000 \text{ lbs}) = 4.9 \text{ TPY}$$

Note: Emission factor of 1.12 lb/hr is based on maximum sawdust generated controlled at an efficiency of 99%. The maximum sawdust generated without control is 112 lbs/hour.

No testing or record keeping is specifically required to demonstrate compliance with this emission limitation, but, if appropriate, may be requested pursuant to OAC rule 3745-15-04(A).

F. Miscellaneous Requirements

None

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Common home building equipment including woodworking equipment hand tools caulk guns and air assisted airless spray paint application equipment.	OAC rule 3745-31-05 (PTI No. 06-06168)	7.08 lbs OC/hr 31.0 TPY of OC
	OAC rule 3745-21-07(G)(2)	See B.1 below.
	OAC rule 3745-17-11	This emission unit is limited to 0.551 pounds per hour and 2.4 tons per year of particulate matter emissions.
	OAC rule 3745-17-07	Visible particulate emissions from the paint area shall not exceed twenty percent opacity, as a six minute average, except for a period of six consecutive minutes in any sixty minute period. Visible particulate emissions shall not exceed sixty percent opacity, as a six-minute average, at any time.

2. Additional Terms and Conditions

- 2.a None

B. Operational Restrictions

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

All American Homes Ohio LLC

PTI Application: 06 06168

Modif

Facility ID: 0660010243

Emissions Unit ID: **R001**

Prior to employing any photochemically reactive materials, the permittee shall obtain an approved modification to this existing PTI from, the Ohio EPA, Southeast District Office.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and cleanup material employed.
 - b. The number of gallons of each coating and cleanup material employed.
 - c. The organic compound (OC) content of each coating and cleanup material, in lbs/gallon.
 - d. The total OC emission rate for all coatings and cleanup materials, in lbs/day.
 - e. The total number of hours the emissions unit was in operation.
 - f. The average hourly OC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in lbs/hr.

D. Reporting Requirements

1. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include an identification of each day during which the average OC emissions from the coatings and cleanup materials exceeded 7.08 lbs/hr, and the actual average OC emissions for each such day.
2. The permittee shall also submit annual reports which specify the total OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

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-
7.08 lbs OC/hr

Applicable Compliance Method-
Compliance shall be based on the record keeping requirements as specified in term C.1.

- b. Emission Limitation-
31.0 TPY of OC

Applicable Compliance Method-

Compliance shall be based on the record keeping requirements as specified in term C.1 and shall be the sum of the 365 daily emission rates for the calendar year.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.
3. Compliance with the particulate matter emission limitation in Section A.I. of these terms and conditions shall be determined in accordance with the following method:

To determine the actual worst case emission rate for particulate matter, the following equation shall be used:

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

$$E = \text{particulate matter emissions rate (lbs/hr)}$$

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

4. Compliance with the visible emissions limitation in A.1 shall be determined using Method 22, pursuant to OAC 3745-17-03 (B)(4).

F. Miscellaneous Requirements

None.

NEW SOURCE REVIEW FORM B

PTI Number: 06-06168

Facility ID: 0660010243

FACILITY NAME All American Homes Ohio Inc

FACILITY DESCRIPTION Common home building equipment

CITY/TWP Zanesville

Emissions Unit ID: **R001**

SIC CODE 2452

SCC CODE 30788801

EMISSIONS UNIT ID F001

EMISSIONS UNIT DESCRIPTION Woodworking operations.

DATE INSTALLED June 1998

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter		1.12	4.91	1.12	4.91
PM ₁₀					
Sulfur Dioxide					
Organic Compounds					
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No

NESHAP? No

PSD? No

OFFSET POLICY? No

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY?

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*?

YES

X NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 06-06168

Facility ID: 0660010243

FACILITY NAME All American Homes Ohio Inc

FACILITY DESCRIPTION Common home building equipment including CITY/TWP Zanesville

Emissions Unit ID: **R001**

SIC CODE 2452 SCC CODE 40200101 Paint 40200701 Adhesives EMISSIONS UNIT ID R001

EMISSIONS UNIT DESCRIPTION Latex paint, adhesives, and sealers application.

DATE INSTALLED June 1998

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter		0.47	0.52	0.551	2.4
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		7.08	7.61	7.08	31.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? No

NESHAP? No

PSD? No

OFFSET POLICY? No

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$N/A

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: Ethylene Glycol

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

NEW SOURCE REVIEW FORM B

PTI Number: 06-06168

Facility ID: 0660010243

FACILITY NAME All American Homes Ohio Inc

FACILITY DESCRIPTION Common home building equipment including

CITY/TWP Zanesville

Emissions Unit ID: **R001** ____

F001 - Woodworking operation.

Applicable Rules/Requirements

OAC rule 3745-31-05

Applicable Emissions
Limitations/Control Measures

LIMIT(s)

2.Additional Terms and Conditions

2.aNone

B.Operational Restrictions

None

C.Monitoring and/or Recordkeeping Requirements

None

D.Reporting Requirements

None

E.Testing Requirements

None

F.Miscellaneous Requirements

None

NEW SC

PTI Num:

FACILITY

FACILITY DESCRIPTION

Common home building equipment including woodworking equipment hand tools caulk guns and air assisted airless spray paint application equipment.

Emissions Unit ID: **R001** _____
CITY/TWP Zanesville

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>
R001 - Latex paint, adhesives, and sealers application.	OAC rule 3745-31-05	LIMIT(s)

2.Additional Terms and Conditions

2.aNone

B.Operational Restrictions

None

C.Monitoring and/or Recordkeeping Requirements

None

D.Reporting Requirements

None

E.Testing Requirements

None

F.Miscellaneous Requirements

NEW SC

PTI Num:

FACILITY

FACILITY DESCRIPTION

Common home building equipment including
woodworking equipment hand tools caulk guns
and air assisted airless spray paint application
equipment.

Emissions Unit ID: **R001** _____
CITY/TWP Zanesville

None