



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL  
TUSCARAWAS COUNTY  
Application No: 06-06007**

**CERTIFIED MAIL**

**DATE: 1/19/00**

Dalton Woodworks  
Brad Brown  
1811 East High Ave Number 33  
New Philadelphia, OH 44663

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 **\$600** 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.

Very truly yours,

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

CC: USEPA  
West Virginia

SEDO  
Pennsylvania



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**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 06-06007**

Application Number: 06-06007  
APS Premise Number: 0679020177  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Dalton Woodworks  
Person to Contact: Brad Brown  
Address: 1811 East High Ave Number 33  
New Philadelphia, OH 44663

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**Kaderly Ave  
New Philadelphia, Ohio**

Description of proposed emissions unit(s):  
**Three spray booths for coating wood furniture.**

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

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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

To be entered upon final issuance

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 are inadequate 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 prove to be inadequate 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**

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 thirty (30) 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**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	47.25

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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>	
Wood furniture spray booth # 1	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)

OAC rule 3745-31-05(D)  
Federally enforceable limitations to  
avoid Title V

Dalto

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Applicable Emissions

Limitations/Control Measures

Emissions of organic compounds shall not exceed 9.25 pounds per hour on any day during which no photochemically reactive materials (as defined in OAC 3745-21-01(C)(5)) are employed in this emissions unit.

Emissions of organic compounds shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC 3745-21-01(C)(5)) are employed in this emissions unit.

Emissions of organic compounds shall not exceed 40.5 tons per year.

Compliance with the Air Toxics Policy. See Sections F.1. - F.3.

Use of controls for particulate matter. See Section A.2.a.

Combined emissions of organic compounds from emissions units R001, R002, and R003 shall not exceed 47.25 tons during any consecutive 12-month period.

The requirements of this rule are equivalent to the limitations on photochemically reactive materials cited above for OAC rule 3745-31-05(A)(3).

Emissions Unit ID: **R001**

**2. Additional Terms and Conditions**

- 2.a** The permittee shall utilize controls for particulate matter (enclosure and filters) at all times when coatings are being applied.

**B. Operational Restrictions**

1. Combined coating usage in emissions units R001, R002, and R003 shall not exceed 15,000 gallons during any consecutive 12-month period. For the first 11 months of this permit, the monthly combined coating usage shall not exceed 1,250 gallons per month.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for the coating line:
- a. The company identification for each coating and cleanup material employed.
  - b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material and identification of each day during which any photochemically reactive coating or cleanup material is employed.
  - c. The number of gallons of each coating and cleanup material employed.
  - d. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - e. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day.
  - f. The total number of hours the emissions unit was in operation.
  - g. The average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

2. The permittee shall collect and record the following information each month for the coating line:

Emissions Unit ID: **R001**

- a. The total number of gallons of all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined.
- b. The total organic compound emission rate for all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined.
- c. The total number of gallons of all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined for the previous 12-month period.
- d. The total organic compound emission rate for all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined for the previous 12-month period.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

3. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports to the Southeast District Office which include the following information:
  - a. An identification of each day during which the average hourly organic compound emission rate (on any day during which any photochemically reactive coating or cleanup material is employed) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day.
  - b. An identification of each day during which the organic compound emission rate (on any day during which any photochemically reactive coating or cleanup material is employed) exceeded 40 pounds per day, and the actual organic compound emission rate for each such

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Emissions Unit ID: **R001**

day.

- c. An identification of each day during which the average hourly organic compound emission rate (on any day during which no photochemically reactive coating or cleanup material is employed) exceeded 9.25 pounds per hour, and the actual average hourly organic compound emission rate for each such day.

To be entered upon final issuance

- d. An identification of each month during which the total organic compound emission rate for all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined for the previous 12-month period exceeded 47.25 tons, and the actual organic compound emission rate for that 12-month period.
- e. An identification of each month during which the total usage rate for all coatings employed in emissions units R001, R002, and R003, combined for the previous 12-month period exceeded 15,000 gallons, and the actual usage rate for that 12-month period.

These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

#### **E. Testing Requirements**

1. Formulation data or USEPA Method 24 shall be used to determine the organic compound or VOC content of each coating and cleanup material
2. Compliance with the organic compound emission limitations listed in Section A of this permit and the coating usage limitation listed in Section B of this permit shall be based upon the record keeping specified in Section C of this permit.

#### **F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" pollutant(s):

- a. Pollutant: Butanol

TLV (ug/m3): 152,000

Maximum Hourly Emission Rate (lbs/hr): 0.925

Dalton Woodworks  
PTI Application: 06-06007  
To be

Facility ID: 0679020177

Emissions Unit ID: **R001**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1182

MAGLC (ug/m3): 3619

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PTI A

Emissions Unit ID: **R001**

To be entered upon final issuance

b. Pollutant: Stoddard solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 4.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5319

MAGLC (ug/m3): 12500

2. Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, 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.).
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
  - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
  - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
  - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the

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Emissions Unit ID: **R001**

permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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Emissions Unit ID: **R001**

To be entered upon final issuance

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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To be entered upon final issuance

Emissions Unit ID: **R002**

**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>	
Wood furniture spray booth # 2	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-31-05(D) Federally enforceable limitations to avoid Title V	

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To be entered upon final issuance

Applicable Emissions

Limitations/Control Measures

Emissions of organic compounds shall not exceed 9.25 pounds per hour on any day during which no photochemically reactive materials (as defined in OAC 3745-21-01(C)(5)) are employed in this emissions unit.

Emissions of organic compounds shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC 3745-21-01(C)(5)) are employed in this emissions unit.

Emissions of organic compounds shall not exceed 40.5 tons per year.

Compliance with the Air Toxics Policy. See Sections F.1. - F.3.

Use of controls for particulate matter. See Section A.2.a.

Combined emissions of organic compounds from emissions units R001, R002, and R003 shall not exceed 47.25 tons during any consecutive 12-month period.

The requirements of this rule are equivalent to the limitations on photochemically reactive materials cited above for OAC rule 3745-31-05(A)(3).

Emissions Unit ID: **R002**

## 2. Additional Terms and Conditions

- 2.a The permittee shall utilize controls for particulate matter (enclosure and filters) at all times when coatings are being applied.

### B. Operational Restrictions

1. Combined coating usage in emissions units R001, R002, and R003 shall not exceed 15,000 gallons during any consecutive 12-month period. For the first 11 months of this permit, the monthly combined coating usage shall not exceed 1,250 gallons per month.

### C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
- The company identification for each coating and cleanup material employed.
  - Documentation on whether or not each coating and cleanup material is a photochemically reactive material and identification of each day during which any photochemically reactive coating or cleanup material is employed.
  - The number of gallons of each coating and cleanup material employed.
  - The organic compound content of each coating and cleanup material, in pounds per gallon.
  - The total organic compound emission rate for all coatings and cleanup materials, in pounds per day.
  - The total number of hours the emissions unit was in operation.
  - The average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

2. The permittee shall collect and record the following information each month for the coating line:

To be entered upon final issuance

- a. The total number of gallons of all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined.
- b. The total organic compound emission rate for all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined.
- c. The total number of gallons of all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined for the previous 12-month period.
- d. The total organic compound emission rate for all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined for the previous 12-month period.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

3. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes 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 preformed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports to the Southeast District Office which include the following information:
  - a. An identification of each day during which the average hourly organic compound emission rate (on any day during which any photochemically reactive coating or cleanup material is employed) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day.
  - b. An identification of each day during which the organic compound emission rate (on any day during which any photochemically reactive coating or cleanup material is employed) exceeded 40 pounds per day, and the actual organic compound emission rate for each such

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Emissions Unit ID: **R002**

day.

- c. An identification of each day during which the average hourly organic compound emission rate (on any day during which no photochemically reactive coating or cleanup material is employed) exceeded 9.25 pounds per hour, and the actual average hourly organic compound emission rate for each such day.

Emissions Unit ID: **R002**

- d. An identification of each month during which the total organic compound emission rate for all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined for the previous 12-month period exceeded 47.25 tons, and the actual organic compound emission rate for that 12-month period.
- e. An identification of each month during which the total usage rate for all coatings employed in emissions units R001, R002, and R003, combined for the previous 12-month period exceeded 15,000 gallons, and the actual usage rate for that 12-month period.

These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

#### **E. Testing Requirements**

1. Formulation data or USEPA Method 24 shall be used to determine the organic compound or VOC content of each coating and cleanup material
2. Compliance with the organic compound emission limitations listed in Section A of this permit and the coating usage limitation listed in Section B of this permit shall be based upon the record keeping specified in Section C of this permit.

#### **F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" pollutant(s):

a. Pollutant: Butanol

TLV (ug/m3): 152,000

Maximum Hourly Emission Rate (lbs/hr): 0.925

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Emissions Unit ID: **R002**

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1182

MAGLC (ug/m3): 3619

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Emissions Unit ID: **R002**

To be entered upon final issuance

b. Pollutant: Stoddard solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 4.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5319

MAGLC (ug/m3): 12500

2. Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, 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.).
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
  - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
  - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
  - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the

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Emissions Unit ID: **R002**

permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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Emissions Unit ID: **R002**

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For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
Wood furniture spray booth # 3	OAC rule 3745-31-05(A)(3)	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-31-05(D) Federally enforceable limitations to avoid Title V	

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Applicable Emissions

Limitations/Control Measures

Emissions of organic compounds shall not exceed 9.25 pounds per hour on any day during which no photochemically reactive materials (as defined in OAC 3745-21-01(C)(5)) are employed in this emissions unit.

Emissions of organic compounds shall not exceed 8 pounds per hour and 40 pounds per day on any day during which photochemically reactive materials (as defined in OAC 3745-21-01(C)(5)) are employed in this emissions unit.

Emissions of organic compounds shall not exceed 40.5 tons per year.

Compliance with the Air Toxics Policy. See Sections F.1. - F.3.

Use of controls for particulate matter. See Section A.2.a.

Combined emissions of organic compounds from emissions units R001, R002, and R003 shall not exceed 47.25 tons during any consecutive 12-month period.

The requirements of this rule are equivalent to the limitations on photochemically reactive materials cited above for OAC rule 3745-31-05(A)(3).

Emissions Unit ID: **R003**

**2. Additional Terms and Conditions**

- 2.a** The permittee shall utilize controls for particulate matter (enclosure and filters) at all times when coatings are being applied.

**B. Operational Restrictions**

1. Combined coating usage in emissions units R001, R002, and R003 shall not exceed 15,000 gallons during any consecutive 12-month period. For the first 11 months of this permit, the monthly combined coating usage shall not exceed 1,250 gallons per month.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information each day for the coating line:
- a. The company identification for each coating and cleanup material employed.
  - b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material and identification of each day during which any photochemically reactive coating or cleanup material is employed.
  - c. The number of gallons of each coating and cleanup material employed.
  - d. The organic compound content of each coating and cleanup material, in pounds per gallon.
  - e. The total organic compound emission rate for all coatings and cleanup materials, in pounds per day.
  - f. The total number of hours the emissions unit was in operation.
  - g. The average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (e)/(f), in pounds per hour (average).

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

2. The permittee shall collect and record the following information each month for the coating line:

- a. The total number of gallons of all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined.
- b. The total organic compound emission rate for all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined.
- c. The total number of gallons of all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined for the previous 12-month period.
- d. The total organic compound emission rate for all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined for the previous 12-month period.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

3. The permittee shall collect and record the following information for each change where air toxic modeling was required pursuant to the Air Toxic Policy:
  - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the Air Toxic Policy; and
  - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports to the Southeast District Office which include the following information:
  - a. An identification of each day during which the average hourly organic compound emission rate (on any day during which any photochemically reactive coating or cleanup material is employed) exceeded 8 pounds per hour, and the actual average hourly organic compound emission rate for each such day.
  - b. An identification of each day during which the organic compound emission rate (on any day during which any photochemically reactive coating or cleanup material is employed) exceeded 40 pounds per day, and the actual organic compound emission rate for each such

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Emissions Unit ID: **R003**

day.

- c. An identification of each day during which the average hourly organic compound emission rate (on any day during which no photochemically reactive coating or cleanup material is employed) exceeded 9.25 pounds per hour, and the actual average hourly organic compound emission rate for each such day.

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- d. An identification of each month during which the total organic compound emission rate for all coatings and cleanup materials employed in emissions units R001, R002, and R003, combined for the previous 12-month period exceeded 47.25 tons, and the actual organic compound emission rate for that 12-month period.
- e. An identification of each month during which the total usage rate for all coatings employed in emissions units R001, R002, and R003, combined for the previous 12-month period exceeded 15,000 gallons, and the actual usage rate for that 12-month period.

These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

#### **E. Testing Requirements**

1. Formulation data or USEPA Method 24 shall be used to determine the organic compound or VOC content of each coating and cleanup material
2. Compliance with the organic compound emission limitations listed in Section A of this permit and the coating usage limitation listed in Section B of this permit shall be based upon the record keeping specified in Section C of this permit.

#### **F. Miscellaneous Requirements**

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worse case" pollutant(s):

- a. Pollutant: Butanol

TLV (ug/m3): 152,000

Maximum Hourly Emission Rate (lbs/hr): 0.925

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Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1182

MAGLC (ug/m3): 3619

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b. Pollutant: Stoddard solvent

TLV (ug/m3): 525,000

Maximum Hourly Emission Rate (lbs/hr): 4.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 5319

MAGLC (ug/m3): 12500

2. Physical changes or changes in the method of operation of the emissions unit that result in changes to the factors affecting the air toxic analysis could result in noncompliance with this permit to install. In order to avoid this noncompliance situation, prior to initiating any changes, permittees are required to conduct an evaluation to determine that the "Air Toxic Policy" is still satisfied. Changes that can affect the "Air Toxic Policy" include, but are not limited to, 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.).
3. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
  - a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
  - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and
  - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the

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Emissions Unit ID: **R003**

permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.