



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

3/26/2013

Certified Mail

Jeff Miller
Century Components
2051 Township Road 444
Sugarcreek, OH 44681

Yes	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
Yes	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0238002009
Permit Number: P0113323
Permit Type: Initial Installation
County: Holmes

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Holmes County Hub. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NEDO

PUBLIC NOTICE

3/26/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Century Components

1874 County Road 140,

Sugarcreek, OH 44681

Holmes County

FACILITY DESC.: All Other Miscellaneous Wood Product Manufacturing

PERMIT #: P0113323

PERMIT TYPE: Initial Installation

PERMIT DESC: Initial installation of a natural gas engine and a spray booth for wood products.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Kevin Fortune, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Century Components is a miscellaneous wood product manufacturer (i.e., kitchen cabinet components and accessories). The facility is installing two new sources, one natural gas engine (RICE) rated at 210 HP, emissions unit P001, and one wood coating booth, emissions unit R001. This permit, which is a new installation of emissions unit P001 and R001, restricts emissions of VOC, each single HAP, and combined total HAPs to avoid being subject to the requirements of Title V and MACT.

3. Facility Emissions and Attainment Status:

The facility is located in Sugarcreek, Holmes County, an area designated as "attainment" for all criteria pollutants, such as ozone, sulfur dioxide, PM_{2.5}, carbon monoxide, and lead. Century Components will not be a "Major Source" for any single hazardous air pollutant (HAP) emissions or combined total HAPs emissions, as well as VOC emissions based upon the federally enforceable facility-wide restrictions. Therefore, the requirements of Title V and Wood Furniture MACT, 40 CFR Part 63, Subpart JJ, will not apply to them. The requirements of MACT, 40 CFR Part 63, Subpart ZZZZ, RICE and NSPS, 40 CFR Part 60, Subpart JJJJ will both apply.

4. Source Emissions:

This FEPTIO contains terms and conditions that restrict the facility-wide emissions of VOC not to exceed 26.26 tons per year, each single HAP not to exceed 9.0 tons per year, and combined total HAPs not to exceed 24.0 tons per year. The VOC emissions from the emissions R001 is also restricted to 24.9 tons per year, a federally enforceable limit. Century Components is also required by this permit to track emissions, keep records, and submit reports.

5. Conclusion:

The emission limitations contained in this FEPTIO are adequate to provide federally enforceable limitations to ensure that the applicable MACT and Title V thresholds will not be exceeded.

6. Please provide additional notes or comments as necessary:

The facility-wide VOC emissions are limited not to exceed 26.26 tons per year. Therefore, best available technology (BAT) study is not applicable.



7. Total Permit Allowable Emissions Summary (for informational purposes only):

	<u>Pollutant</u>	<u>Tons Per Year</u>
	Each single HAP _{Facility-wide}	9.0
	Combined total HAPs _{Facility-wide}	24.0
	VOC _{R001}	24.9
	VOC _{Facility-wide}	26.26
NO _x _{P001}	1.97	
CO _{P001}	4.08	



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Century Components**

Facility ID:	0238002009
Permit Number:	P0113323
Permit Type:	Initial Installation
Issued:	3/26/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Century Components

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Draft Permit-to-Install and Operate

Century Components

Permit Number: P0113323

Facility ID: 0238002009

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0238002009
Application Number(s): A0047002
Permit Number: P0113323
Permit Description: Initial installation of a natural gas engine and a spray booth for wood products.
Permit Type: Initial Installation
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 3/26/2013
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Century Components
1874 County Road 140
Sugarcreek, OH 44681

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0113323

Permit Description: Initial installation of a natural gas engine and a spray booth for wood products.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P001
Company Equipment ID:	Natural Gas Engine #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	R001
Company Equipment ID:	Spray Booth #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate

Century Components

Permit Number: P0113323

Facility ID: 0238002009

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate

Century Components

Permit Number: P0113323

Facility ID: 0238002009

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) B.3.
2. The Ohio EPA has determined that this facility may be applicable to the requirements of 40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.
3. Facility-wide Requirements:
 - a) Applicable Emissions Limitations and/or Control Requirements
 - (1) In accordance with OAC rule 3745-31-05 (D)(1)(b), the permittee proposed the following restrictions to avoid Title V requirements and MACT requirements under 40 Code of Federal Register Part 63, Subpart JJ, Standards for Hazardous Air Pollutant Emissions From Wood Furniture Manufacturing Operations:
 - a. facility-wide VOC emissions shall not exceed 26.26 tons per year, based upon a rolling, 12-month summation of VOC emissions;
 - b. facility-wide emissions of each individual hazardous air pollutant (HAP) shall not exceed 9.0 tons per year, based upon a rolling, 12-month summation; and
 - c. facility-wide emissions of total combined HAPs shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation.
 - b) Operational Restrictions
 - (1) None.
 - c) Monitoring and/or Recordkeeping Requirements:
 - (1) The permittee shall maintain the following facility-wide information each month:
 - a. the monthly VOC emissions, in tons per month;



- b. the rolling, 12-month summation of total VOC emissions, in tons;
- c. the monthly individual HAP emissions, in tons per month;
- d. the rolling, 12-month summation of individual HAP emissions, in tons;
- e. the monthly total combined HAP emissions, in tons per month; and
- f. the rolling, 12-month summation of total combined HAP emissions, in tons.

d) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. facility-wide VOC emissions shall not exceed 26.26 tons per year, based upon a rolling, 12-month summation of VOC emissions;
 - ii. facility-wide emissions of each individual HAP shall not exceed 9.0 tons per year, based upon a rolling, 12-month summation; and
 - iii. facility-wide emissions of total combined HAP shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Ohio EPA Northeast District Office).



e) Testing Requirements

(1) Compliance with the allowable emission limitations in B.3.a)(1) above shall be determined in accordance with the following methods:

a. Emission Limitation:

Facility-wide VOC emissions shall not exceed 26.26 tons per year, based upon a rolling, 12-month summation of VOC emissions.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in B.3.c)(1)b.

b. Emission Limitation:

Facility-wide emissions of each individual HAP shall not exceed 9.0 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in B.3.c)(1)d.

c. Emission Limitation:

Facility-wide emissions of total combined HAP shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in B.3.c)(1)f.



Draft Permit-to-Install and Operate

Century Components

Permit Number: P0113323

Facility ID: 0238002009

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P001, Natural Gas Engine #1

Operations, Property and/or Equipment Description:

210 HP, EDI, Stationary natural gas-fired spark ignition reciprocating internal combustion engine, manufactured on or after 1/1/11, and certified to the exhaust emission standards identified in Table 1 to Part 60, Subpart JJJJ.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart JJJJ In accordance with 40 CFR 60.4230, this emissions unit is subject to the New Source Performance Standards (NSPS) for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE). 40 CFR 60.4233(e) 40 CFR 60.4231(e)-mfg. Table 1 to Part 60, Subpart JJJJ	The exhaust emissions from this engine shall not exceed: 1.0 gram of nitrogen oxides per horsepower hour (1.0 g NO _x /HP-hr) or 82 ppmvd at 15% O ₂ . 2.0 grams of carbon monoxide per horsepower hour (2.0 g CO/HP-hr) or 270 ppmvd at 15% O ₂ . 0.7 gram of volatile organic compounds per horsepower hour (0.7 g VOC/HP-hr) or 60 ppmvd at 15% O ₂ . See b)(2)a. and b)(2)b.



b.	OAC rule 3745-17-11(B)(5)(a)	Particulate emissions (PE) shall not exceed 0.310 lb/mmBtu of actual heat input from ICE less than or equal to 600 horsepower (HP).
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-18-06(G)	See b)(2)c.
e.	OAC rule 3745-31-05(A)(3) as effective 11/30/01.	The requirements established pursuant to this rule include the requirements of 40 CFR, Part 60, Subpart JJJJ and 40 CFR, Part 63, Subpart ZZZZ. See b)(2)d., b)(2)e., and b)(2)h.
f.	OAC rule 3745-31-05(A)(3) as effective 12/01/06.	See b)(2)f. and b)(2)g.

(2) Additional Terms and Conditions

- a. The stationary spark ignition (SI) internal combustion engine (ICE) is subject to and shall be operated in compliance with the requirements of 40 CFR Part 60, Subpart JJJJ, the standards of performance for stationary SI ICE.
- b. The stationary SI ICE has been or shall be purchased certified by the manufacturer to emission standards as stringent as those identified in 40 CFR 60.4233(e) and found in Table 1 of Part 60, Subpart JJJJ for engines greater than or equal to 100 HP and less than 500 HP and manufactured on or after 1/1/11.
- c. In accordance with OAC rule 3745-18-06(A), this emissions unit is exempt from OAC rule 3745-18-06(G) during any calendar day in which natural gas is the only fuel burned.
- d. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S.



EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply: b)(1)e., b)(2)d., b)(2)e., f)(2)c.ii., f)(2)d.ii., and f)(2)e.ii..

- e. The emissions generated from operating the engine shall not exceed the following:
 - i. 2.03 tons per year of NO_x emissions;
 - ii. 4.06 tons per year of CO emissions; and
 - iii. 1.42 tons per year of VOC emissions.
- f. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.
- g. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the following emissions from this air contaminant source since the uncontrolled potential to emit for these emissions is each less than 10 tons/year.
 - i. VOC, SO₂, and particulate emissions.
- h. This air contaminant source takes into account the use of a three-way catalyst (TWC) to reduce emissions of NO_x and CO, as proposed by the permittee, for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) The stationary SI ICE shall be installed, operated, and maintained according to the manufacturer's specifications, written instructions, and procedures over the entire life of the engine. The permittee shall operate and maintain the stationary SI ICE to achieve the emission standards identified in 40 CFR 60.4233(e) and found in Table 1 of NSPS Subpart JJJJ over the entire life of the engine. The air-to-fuel ratio controllers shall be set by the manufacturer and/or according to the operations manual, to ensure proper operation of the engine and control device and to minimize emissions.
- (2) During emergency conditions the permittee may operate this engine using propane for a maximum of 100 hours per year as an alternative fuel and if records are maintained for such use. If the engine is not certified to burn propane the permittee shall conduct a performance test to demonstrate compliance with the emission standards in 40 CFR 60.4233.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain a record of the natural gas burned in this ICE during each calendar year. The natural gas usage can be calculated at the end of each year using



the best method available to estimate the annual throughput, which might include but shall not be limited to: readings from the facility's natural gas meter, the facility's natural gas bill, the recorded or estimated hours of operation along with the manufacturer's documentation on the maximum natural gas fuel flow rate.

- (2) The permittee shall maintain the manufacturer's certification on site or at a central location for all facility ICE and it shall be made available for review upon request. If the manufacturer's certification is not kept on site, the permittee shall maintain a log for the location of each ICE and it shall identify the agency-assigned emissions unit number, the manufacturer's identification number, and the identification number of the certificate. The manufacturer's operations manual shall be maintained at the same location as the ICE.
- (3) The permittee shall maintain the following records and make them available upon request:
 - a. all notifications submitted to comply with and all documentation supporting compliance with Part 60 Subpart JJJJ;
 - b. records of all maintenance conducted on the engine;
 - c. the certification from the manufacturer, documenting that the engine is certified to meet the emission standards identified in 40 CFR 60.4231(e); and
 - d. the information identified in 40 CFR parts 90, 1048, 1054, and/or 1060 that is required to be provided by the manufacturer to the operator/owner, as applicable to the model year and horsepower of the engine.
- e) Reporting Requirements.
 - (1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- f) Testing Requirements
 - (1) If the natural gas engine was purchased without an EPA certificate of conformity, the engines will need to meet the performance testing requirements of 40 CFR 60.4243(b)(2)(i) and the permittee will be required to conduct an initial performance test to demonstrate compliance with the emission limits from Part 60 Subpart JJJJ.
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



a. Opacity Limitation:

Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A.

b. Emission Limitations:

0.310 lb PE/mmBtu from ICE less than or equal to 600 HP

Applicable Compliance Method:

The particulate emission limitation is from OAC rule 3745-17-11(B)(5)(a) for stationary internal combustion engines.

If required, the permittee shall demonstrate compliance with the PE emission limitation through exhaust emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitations:

i. 1.0 gram NO_x/HP-hr or 82 ppmvd at 15% O₂

ii. 2.03 tons NO_x/year

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the manufacturer's certification to the emission standards identified in 40 CFR 60.4231(e) and by maintaining the engine according to the manufacturer's specifications. The g/HP-hr limit is the emission limitation from Table 1 to Part 60 Subpart JJJJ, the exhaust emission standards for natural gas engines greater than or equal to 100 HP and less than 500 HP, manufactured on/after 1/1/11.

Compliance with the ton per year NO_x emissions limitation shall be determined by the following calculation:

$$1.0 \text{ g NO}_x/\text{HP-hr} \times 1 \text{ lb}/453.6 \text{ g} \times 210 \text{ HP} = 0.463 \text{ lb NO}_x/\text{hr}$$

$$0.463 \text{ lb NO}_x/\text{hr} \times 8760 \text{ hours/year} \times 1 \text{ ton}/2000 \text{ lbs} = 2.03 \text{ tons NO}_x/\text{year}$$

Where there is no certificate of conformity, the permittee shall demonstrate compliance with the NO_x limitation according to the requirements of 40 CFR 60.4244, using the applicable test methods in Table 2 to Part 60 Subpart JJJJ.



d. Emission Limitations:

- i. 2.0 grams CO/HP-hr or 270 ppmvd at 15% O₂
- ii. 4.06 tons CO/year

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the manufacturer's certification to the emission standards identified in 40 CFR 60.4231(e) and by maintaining the engine according to the manufacturer's specifications. The g/HP-hr limit is the emission limitation from Table 1 to Part 60 Subpart JJJJ, the exhaust emission standards for natural gas engines greater than or equal to 100 HP and less than 500 HP, manufactured on/after 1/1/11.

Compliance with the ton per year CO emissions limitation shall be determined by the following calculation:

$$2.0 \text{ g CO/HP-hr} \times 1 \text{ lb/453.6 g} \times 210 \text{ HP} = 0.925 \text{ lbs CO/hr}$$

$$0.925 \text{ lbs CO/hr} \times 8760 \text{ hours/year} \times 1 \text{ ton/2000 lbs} = 4.06 \text{ tons CO/year}$$

Where there is no certificate of conformity, the permittee shall demonstrate compliance with the CO limitation according to the requirements of 40 CFR 60.4244, using the applicable test methods in Table 2 to Part 60 Subpart JJJJ.

e. Emission Limitations:

- i. 0.7 gram VOC/HP-hr or 60 ppmvd at 15% O₂
- ii. 1.42 tons VOC/year

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the manufacturer's certification to the emission standards identified in 40 CFR 60.4231(e) and by maintaining the engine according to the manufacturer's specifications. The g/HP-hr limit is the emission limitation from Table 1 to Part 60 Subpart JJJJ, the exhaust emission standards for natural gas engines greater than or equal to 100 HP and less than 500 HP, manufactured on/after 1/1/11.

Compliance with the ton per year VOC emissions limitation shall be determined by the following calculation:

$$0.7 \text{ g VOC/HP-hr} \times 1 \text{ lb/453.6 g} \times 210 \text{ HP} = 0.324 \text{ lb VOC/hr}$$

$$0.324 \text{ lb VOC/hr} \times 8760 \text{ hours/year} \times 1 \text{ ton/2000 lbs} = 1.42 \text{ tons VOC/year}$$

Where there is no certificate of conformity, the permittee shall demonstrate compliance with the VOC limitation according to the requirements of 40 CFR



Draft Permit-to-Install and Operate

Century Components

Permit Number: P0113323

Facility ID: 0238002009

Effective Date: To be entered upon final issuance

60.4244, using the applicable test methods in Table 2 to Part 60 Subpart JJJJ.

g) Miscellaneous Requirements

(1) None.



2. R001, Spray Booth #1

Operations, Property and/or Equipment Description:

7400 cfm, cross-draft spray booth for the manual spray application of finish to wood products

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)e, d)(6), d)(7), d)(8), d)(9) and e)(1).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)d, b)(2)a, d)(11)i, e)(2) and f)(1)a.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(C)	See c)(1), c)(2), d)(1), d)(2), d)(3), d)(4) and d)(5).
b.	OAC 3745-21-15	This rule is not applicable. See b)(2)a.
c.	ORC 3704.03(T)	VOC emissions from this emissions unit shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation of VOC emissions.
d.	OAC rule 3745-31-05(D)(1)(b)	See B.3.a)(1) and b)(2)a.
e.	ORC 3704.03(F)(4)	See d)(6), d)(7), d)(8), d)(9) and e)(3).

(2) Additional Terms and Conditions

a. The permittee proposed the following restrictions to avoid Title V requirements, OAC rule 3745-21-15, as well as MACT requirements under 40 Code of Federal Register Part 63, Subpart JJ, Standards for Hazardous Air Pollutant Emissions From Wood Furniture Manufacturing Operations:



- i. VOC emissions from this emissions unit shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation of VOC emissions.
- c) Operational Restrictions
- (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
 - (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
 - (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
 - (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
 - (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.



- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) The FEPTIO application for this emissions unit, R001, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$



- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m³): 75.36196

Maximum Hourly Emission Rate (lbs/hr): 2.30

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 152.62

MAGLC (ug/m³): 1794.33

The permittee, has demonstrated that emissions of toluene, from emissions unit R008, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (7) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a “modification” under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.



- (8) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (9) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (10) The permittee shall collect and record the following information each day for this emissions unit:
- a. the company identification for each coating and cleanup material employed;
 - b. the VOC content of each coating and cleanup material, in lbs/gallon, as applied;
 - c. the number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;
- (11) The permittee shall collect and record the following information each month for this emissions unit:
- a. the name or identification number of each coating and cleanup material employed;
 - b. the volume, in gallons, of each coating and cleanup material employed, i.e., the summation of daily coating and cleanup material usage, recorded in d)(10)c, for the month;



- c. each individual HAP content for each coating and cleanup material employed, in pounds per gallon;
- d. the total emissions of each individual HAP from all coatings and cleanup materials employed, i.e., the summation of the products of "b" times "c";
- e. the total combined HAP content for each coating and cleanup material employed, in pounds per gallon;
- f. the total emissions of total combined HAP from all coatings and cleanup materials employed, i.e., the summation of the products of "b" times "e";
- g. the VOC content of each coating and cleanup material, in lbs/gallon, as applied;
- h. the total VOC emissions from all coatings and cleanup material employed, i.e., the summation of the products of "b" times "g"; and
- i. the rolling, 12-month summation of total VOC emissions, in tons.

e) Reporting Requirements

- (1) The permittee shall also submit annual reports to the Ohio EPA, Northeast District Office, documenting any changes made to a parameter or value used in the dispersion model (including the air toxic compounds emitted and the emission rate), that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. VOC emissions from this emissions unit shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation of VOC emissions;
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to



March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Ohio EPA Northeast District Office).

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

VOC emissions from this emissions unit shall not exceed 24.9 ton per year, based upon a rolling, 12-month summation of VOC emissions

- a. Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(11)i.

- (2) USEPA Method 24 or formulation data shall be used to determine the VOC content of each coating and cleanup material.
- (3) Formulation data shall be used to determine the contents of each individual HAP and total combined HAP.

g) Miscellaneous Requirements

- (1) None.