



Environmental Protection Agency

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

Certified Mail

2/17/2011

Kim Root
N WASSERSTROM & SONS INC
2300 LOCKBOURNE ROAD
Columbus, OH 43207

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

Facility ID: 0125040342
Permit Number: P0106738
Permit Type: Initial Installation
County: Franklin

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

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 EPA Weekly Review and the local newspaper, The Columbus Dispatch. 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 "Issued Air Pollution Control Permits" link. 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, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

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 in writing 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, Central District Office at (614)728-3778.

Sincerely,


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

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

N Wasserstrom and Sons is a foodservice supplies and equipment manufacturer and distributor. The facility has been operating a spray booth since 2002 and 4 adhesive coating lines since 2005. The facility is located at 2300 Lockbourne Road, Columbus, Ohio, 43207.

3. Facility Emissions and Attainment Status:

Facility emissions are primarily VOC, HAP and PE. Potential emissions are 152.21 tons per year of VOC, 38.17 tons per year of toluene (individual HAP) and 42.83 tons per year of combined HAP. The facility has provided records to prove that the actual emissions since installation have been below 5 tons of an individual HAP and 12.5 tons of combined HAP to remain an area source in accordance with 40 CFR 63.800(b)(3). Furthermore, the facility is requesting federally enforceable restrictions to remain a synthetic minor facility. The facility is located in Franklin County, Ohio, which is in attainment for all criteria pollutants.

4. Source Emissions:

Source emissions are VOC, HAP and PE. The single highest HAP is toluene. The sources are subject to OAC 3745-31-05(A)(3), OAC 3745-31-05(D), OAC 3745-17-11(C), OAC 3745-17-07(A) and (B) and OAC 3745-21-09(U). The facility is not subject to the wood furniture MACT as records prove HAP emissions are less than 5 tpy for an individual HAP and 12.5 tpy for combined HAP.

To continue to remain an area source and not be subject to the MACT, the permittee is voluntarily restricting HAP emissions to 9.9 tons per year of individual HAP and 24.9 tons per year of combined HAP.

Spray booth

The facility has requested voluntary restrictions on coating usage to limit VOC and HAP emissions. The facility is requesting a total usage limitation of 2,128.75 gallons/year (1,855 gallons of coating per year and 273.75 gallons of cleanup per year).

VOC

$E = \text{Adhesive usage (gallons/yr)} \times \text{adhesive VOC density (lb/gal)} \times 1 \text{ ton}/2000 \text{ lbs}$

$E = 1,855 \text{ gallons of coating/year} \times 6.72 \text{ lb VOC/gal} \times 1 \text{ ton}/2000 \text{ lbs}$
 $E = 6.23 \text{ tons of VOCs from coatings per year}$

$E = 273.75 \text{ gallons of cleanup/year} \times 6.31 \text{ lb VOC/gal} \times 1 \text{ ton}/2000 \text{ lbs}$
 $E = 0.86 \text{ tons VOCs from cleanup per year}$



Total VOC emissions will be 7.10 tons per year

Hourly emissions are determined based upon operational information provided by the permittee.

$$E = \text{Annual emissions} \times 1 \text{ year}/365 \text{ days} \times 1 \text{ day}/8 \text{ hours} \times 2,000 \text{ lbs/ton}$$

$$E = 6.23 \text{ tons of VOC from coatings/year} \times 1 \text{ year}/365 \text{ days} \times 1 \text{ day}/8 \text{ hours} \times 2,000 \text{ lbs/ton}$$

$$E = 4.27 \text{ lbs of VOC from coatings/hr}$$

$$E = 0.86 \text{ ton of VOC from cleanup/year} \times 1 \text{ year}/365 \text{ days} \times 1 \text{ day}/8 \text{ hours} \times 2,000 \text{ lbs/ton}$$

$$E = 0.59 \text{ lb VOC from cleanup/hr}$$

Total VOC emissions per hour will be 4.86 lbs/hr

PE

$$E = \text{Adhesive usage (gallons/year)} \times \text{adhesive density (lb/gal)} \times \text{solids content(weight\%)} \times 1 \text{ ton}/2000 \text{ lbs}$$

$$E = 1,855 \text{ gal/yr} \times 11.73 \text{ lb/gal} \times 94.66\% \times 1 \text{ ton}/2000 \text{ lbs}$$

$$E = 10.30 \text{ ton/year}$$

Hourly emissions are determined based upon operational information provided by the permittee.

$$\text{Usage} = 1,855 \text{ gal coating/yr} \times 1 \text{ year}/365 \text{ days} \times 1 \text{ day}/8 \text{ hours}$$

$$\text{Usage} = 0.63 \text{ gal coating/hr}$$

$$E = 0.63 \text{ gal/hr} \times 11.73 \text{ lb/gal} \times 94.66\%$$

$$E = 7.00 \text{ lb PE from coating/hr}$$

The coating operation has a 70% transfer efficiency and the spray booth has a control efficiency of 80%. Including the efficiency of the equipment, emissions are:

$$E = \text{Adhesive usage (gallons/hr)} \times \text{adhesive density (lb/gal)} \times \text{solids content(weight\%)} \times (1 - \text{transfer efficiency}) \times (1 - \text{spray booth efficiency})$$

$$E = 0.63 \text{ gal/hr} \times 11.73 \text{ lb/gal} \times 94.66\% \times (1 - 70\%) \times (1 - 80\%)$$

$$E = 0.42 \text{ lb/hr}$$

$$E = 1,855 \text{ gal/yr} \times 11.73 \text{ lb/gal} \times 94.66\% \times 1 \text{ ton}/2000 \text{ lbs} \times (1 - 70\%) \times (1 - 80\%)$$

$$E = 0.93 \text{ ton/yr}$$

There are no solids in the cleanup material, based upon the information provided by the permittee.

Adhesive Stations (4 total stations)

The facility has requested voluntary restrictions on coating usage to limit VOC and HAP emissions. The facility is requesting a total usage limitation of 3,575 gallons/year per adhesive station (3,520 gallons of coating per year and 55 gallons of cleanup per year).

VOC

$$E = \text{Adhesive usage (gallons/yr)} \times \text{adhesive VOC density (lb/gal)} \times 1 \text{ ton}/2000 \text{ lbs}$$

$$E = 3,520 \text{ gallons of coating/year} \times 5.01 \text{ lb VOC/gal} \times 1 \text{ ton}/2000 \text{ lbs}$$

$$E = 8.82 \text{ tons of VOCs from coatings per year}$$



$E = 55 \text{ gallons of cleanup/year} \times 6.12 \text{ lb VOC/gal} \times 1 \text{ ton}/2000 \text{ lbs}$
 $E = 0.17 \text{ tons VOCs from cleanup per year}$

Total VOC emissions will be 8.99 tons per year per station (a total of 35.95 tons of VOC per year from the 4 stations)

Hourly emissions are determined based upon operational information provided by the permittee.

$E = \text{Annual emissions} \times 1 \text{ year}/365 \text{ days} \times 1 \text{ day}/8 \text{ hours} \times 2,000 \text{ lbs/ton}$
 $E = 8.82 \text{ tons of VOC from coatings/year} \times 1 \text{ year}/365 \text{ days} \times 1 \text{ day}/8 \text{ hours} \times 2,000 \text{ lbs/ton}$
 $E = 6.04 \text{ lbs of VOC from coatings/hr}$

$E = 0.17 \text{ ton of VOC from cleanup/year} \times 1 \text{ year}/365 \text{ days} \times 1 \text{ day}/8 \text{ hours} \times 2,000 \text{ lbs/ton}$
 $E = 0.12 \text{ lb VOC from cleanup/hr}$

Total VOC emissions per hour will be 6.16 lbs/hr (a total of 24.64 lbs of VOC per hour from the 4 stations)

PE

$E = \text{Adhesive usage (gallons/year)} \times \text{adhesive density (lb/gal)} \times \text{solids content (weight\%)} \times 1 \text{ ton}/2000 \text{ lbs}$
 $E = 3,520 \text{ gal/yr} \times 6.32 \text{ lb/gal} \times 19\% \times 1 \text{ ton}/2000 \text{ lbs}$
 $E = 2.11 \text{ ton/year (a total of 8.44 tons of PE per year from the 4 stations)}$

Hourly emissions are determined based upon operational information provided by the permittee.

$\text{Usage} = 3,520 \text{ gal coating/yr} \times 1 \text{ year}/365 \text{ days} \times 1 \text{ day}/8 \text{ hours}$
 $\text{Usage} = 1.21 \text{ gal coating/hr}$
 $E = 1.21 \text{ gal/hr} \times 6.32 \text{ lb/gal} \times 19\%$
 $E = 1.45 \text{ lb PE from coating/hr (a total of 5.8 lbs PE per hour from the 4 stations)}$

The coating operation has a 70% transfer efficiency and the spray booth has a control efficiency of 80%. Including the efficiency of the equipment, emissions are:

$E = \text{Adhesive usage (gallons/hr)} \times \text{adhesive density (lb/gal)} \times \text{solids content (weight\%)} \times (1 - \text{transfer efficiency}) \times (1 - \text{control efficiency})$

$E = 1.21 \text{ gal/hr} \times 6.32 \text{ lb/gal} \times 19\% \times (1 - 70\%) \times (1 - 80\%)$
 $E = 0.09 \text{ lb/hr (a total of 0.36 lbs PE per hour from the 4 stations)}$

$E = 3,520 \text{ gallons/year} \times 6.32 \text{ lb/gal} \times 19\% \times 1 \text{ ton}/2000 \text{ lbs} \times (1 - 70\%) \times (1 - 80\%)$
 $E = 0.30 \text{ tons/year (a total of 1.20 tons/year from the 4 stations)}$

5. Conclusion:

Permit monitoring and recordkeeping, while maintaining compliance with other terms and conditions in the permit, should ensure compliance with applicable state and federal rules.

6. Please provide additional notes or comments as necessary:

Permit fees are doubled as the sources were installed and operating without a permit.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>PE</u>	<u>2.13</u>
<u>VOC</u>	<u>43.05</u>
<u>iHAP</u>	<u>9.9</u>
<u>tHAP</u>	<u>24.9</u>

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
N WASSERSTROM & SONS INC

Issue Date: 2/17/2011
Permit Number: P0106738
Permit Type: Initial Installation
Permit Description: 4 adhesive stations with spray booths and 1 spray booth with federally enforceable restrictions to limit VOC and HAP emissions.
Facility ID: 0125040342
Facility Location: N WASSERSTROM & SONS INC
2300 LOCKBOURNE ROAD,
Columbus, OH 43207
Facility Description: Institutional Furniture Manufacturing, Showcase, Partition, Shelving, and Locker Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Barbara Walker at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049 or (614)728-3778. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
N WASSERSTROM & SONS INC**

Facility ID:	0125040342
Permit Number:	P0106738
Permit Type:	Initial Installation
Issued:	2/17/2011
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
N WASSERSTROM & SONS INC

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Authorization

Facility ID: 0125040342
Application Number(s): A0039541
Permit Number: P0106738
Permit Description: 4 adhesive stations with spray booths and 1 spray booth with federally enforceable restrictions to limit VOC and HAP emissions.
Permit Type: Initial Installation
Permit Fee: \$2,000.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 2/17/2011
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:

N WASSERSTROM & SONS INC
2300 LOCKBOURNE ROAD
Columbus, OH 43207

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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: P0106738

Permit Description: 4 adhesive stations with spray booths and 1 spray booth with federally enforceable restrictions to limit VOC and HAP emissions.

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

Emissions Unit ID:	K001
Company Equipment ID:	Z001
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Adhesive Stations

Emissions Unit ID:	K002
Company Equipment ID:	Z002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Z003
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K004
Company Equipment ID:	Z004
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K005
Company Equipment ID:	Z005
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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, Central 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.

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) Allowable Facility Emission Limitations:

The emissions of HAPs, as identified in Section 112(b) of Title III of the Clean Air Act, from all emissions units at this facility shall not exceed 9.9 TPY for any individual HAP and 24.9 TPY for any combination of HAPs, based upon rolling, 12-month summations of the HAP emissions.
 - (2) Recordkeeping Requirements:

The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)¹ that are applied in emissions units K001, K002, K003, K004 and K005:

 - a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;
 - b. the name/identification of each individual HAP contained in each material applied (and identified in a above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;
 - c. the number of gallons of each coating, thinner, additive, cleanup material, and other material applied during the month;
 - d. for each individual HAP, the total uncontrolled emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of b times c for all the materials applied during the month, divided by 2,000 pounds;
 - e. the total uncontrolled combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from d above;
 - f. for each individual HAP, the calculated, controlled emission rate from all the materials employed, in ton(s), i.e., the total uncontrolled individual HAP emission rate calculated in d above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance;

- g. the calculated, controlled combined HAPs emission rate for all the materials employed, in ton(s), i.e., the uncontrolled total combined HAPs emission rate, calculated in e above, multiplied by 1 minus the overall control efficiency for the control equipment, as determined during the most recent emissions test that demonstrated the emissions unit was in compliance;
- h. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in f above, for the present month plus the previous 11 months of operation, in ton(s); and
- i. the total combined HAP emissions during the rolling 12-month period, i.e., the summation of all HAP emissions, as recorded in g above, for the present month plus the previous 11 months of operation, in ton(s).

¹A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

(3) Reporting Requirements:

The permittee shall submit quarterly deviation (excursion) reports that identify:

- i. all exceedances of the rolling, 12-month individual HAP emission limitation; and
- ii. all exceedances of the rolling, 12-month combined HAP emission limitation.

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 appropriate District Office or local air agency).

(4) Applicable Compliance Method:

Compliance with these emission limitations shall be determined through the recordkeeping requirements established in b)(2) above.

C. Emissions Unit Terms and Conditions

1. K001, Z001

Operations, Property and/or Equipment Description:

JBI Spray Booth Model 108-158

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. b)(1)c., b)(2)c., d)(7), d)(8), e)(3), f)(1)c. and f)(1)d.

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 3745-31-05(A)(3), as effective 11/30/2001	Particulate emissions (PE) shall not exceed 0.42 pounds per hour and 0.93 tons per rolling, 12-month period. See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(C).
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)b.
c.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	Volatile organic compound (VOC) emissions shall not exceed 4.86 pounds per hour and 7.10 tons per rolling, 12-month. See b)(2)c.
d.	OAC rule 3745-17-11(C)	See c)(1) and c)(2).
e.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)d.
f.	OAC rule 3745-21-07(G)	See b)(2)e. and d)(8).

Draft Permit-to-Install and Operate

N WASSERSTROM & SONS INC

Permit Number: P0106738

Facility ID: 0125040342

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
g.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
h.	OAC rule 3745-17-07(B)	Visible emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.

(2) Additional Terms and Conditions

- a. 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. 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.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) from this air contaminant source since the uncontrolled potential to emit for PE is less than 10 tons/year.
- c. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating and cleanup usage, upon issuance of this permit. The maximum annual coating and cleanup usage for this emissions unit shall not exceed 2,128.75 gallons (1,855 gallons of coating and 273.75 gallons of cleanup material) based upon a rolling, 12-month summation of the coating and cleanup usage figures.
- d. The permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.
- e. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of

the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

d)(8), e)(3)a.ii. and e)(3)a.iii.

c) Operational Restrictions

- (1) The permittee shall operate the 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(s) was/were 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 permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (7) The permittee shall maintain monthly records of the following information:
 - a. the coating and clean-up usage for each month; and
 - b. the rolling, 12-month summation of the coating and clean-up usage.
- (8) The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;

- b. the number of gallons of each coating and photochemically reactive cleanup material employed;
- c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
- d. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
- e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
- f. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), 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).]

- (9) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), K001, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The “Toxic Air Contaminant Statute,” ORC 3704.03(F), was applied to this/these emissions unit(s) 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(s), (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., 8 hours per day and 7 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):

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

- 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 and Stoddard solvent

TLV (mg/m3): 75 for toluene and 525 for Stoddard solvent

Maximum Hourly Emission Rate (lbs/hr): 2.84 for toluene and 2.07 for Stoddard solvent

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 177 for toluene and 129 for Stoddard solvent

MAGLC (ug/m3): 1,780 for toluene and 12,500 for Stoddard solvent

The permittee, has demonstrated that emissions of toluene and Stoddard solvent, from emissions unit(s) K001, 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).

- (10) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration”, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC 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.

- (11) 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.

- (12) 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.

e) 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) 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.
- (3) 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. The permittee shall not use more than 1,855 gallons of coating material and 273.75 gallons of cleanup material per rolling, 12-month period;
 - ii. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - iii. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day
 - 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 appropriate District Office or local air agency).

- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(6) above:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;

- b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.
- (5) The permittee shall include any changes made to a parameter or value used in the dispersion model, 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, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- f) Testing Requirements
- (1) Compliance with the emission limitations in Section b)(1) of the terms and condition of this permit shall be determined in accordance with the following methods:
- a. Emission Limitation:
0.42 pounds of particulate emission (PE) per hour

Applicable Compliance Method:
The emission limitation was established by multiplying the gallons per hour usage of coating by the density of the coating then by the percent of solids in the coating. Then multiply the product by a transfer control efficiency of 70% and a paint booth efficiency of 80%.
 - b. Emission Limitation:
0.93 tons of PE per rolling, 12-month period

Applicable Compliance Method:
The emission limitation was established by multiplying the maximum annual coating usage of 1,855 gallons by the density of the coating then by the percent solids in the coating. Then multiply the product by a transfer control efficiency of 70% and a paint booth efficiency of 80%.
 - c. Emission Limitation:
4.86 pounds of volatile organic compounds (VOCs) per hour

Applicable Compliance Method:
The emission limitation was established by multiplying the hourly usage of coating and cleanup materials by the VOC density per gallon of the materials.
 - d. Emission Limitation:
7.10 tons of VOC per rolling, 12-month period

Applicable Compliance Method
The emission limitation was established by multiplying the maximum annual coating usage by the VOC density per gallon of the coating and a conversion

factor of 1 ton/2,000 lbs. The product was then added to the product found by multiplying the maximum annual usage of cleanup materials by the VOC density per gallon of the cleanup materials and a conversion factor of 1 ton/2,000 lbs.

e. Emission Limitation:

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule; and visible emissions from fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Adhesive Stations: K002, K003, K004, K005,

EU ID	Operations, Property and/or Equipment Description
K002	Adhesive Line #1
K003	Adhesive Line #2
K004	Adhesive Line #3
K005	Adhesive Line #4

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. b)(1)c., b)(2)c., d)(7), d)(8), e)(3), f)(1)c. and f)(1)d.

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 3745-31-05(A)(3), as effective 11/30/2001	Particulate emissions (PE) shall not exceed 1.45 pounds per hour and 2.11 tons per rolling, 12-month period. See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-11(C)
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/2006	See b)(2)b.
c.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	Volatile organic compound (VOC) emissions shall not exceed 6.16 pounds per hour and 8.99 tons per rolling, 12-month. See b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-11(C)	See c)(1) and c)(2).
e.	OAC rule 3745-21-07(G)	See b)(2)d. and d)(8).
f.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
g.	OAC rule 3745-17-07(B)	Visible emissions of fugitive dust from this emissions unit shall not exceed twenty percent opacity as a three-minute average.

(2) Additional Terms and Conditions

- a. 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. 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.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) from this air contaminant source since the uncontrolled potential to emit for PE is less than 10 tons/year
- c. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating and cleanup usage, upon issuance of this permit. The maximum annual coating and cleanup usage for this emissions unit shall not exceed 3,575 gallons (3,520 gallons of coating and 55 gallons of cleanup material) based upon a rolling, 12-month summation of the coating and cleanup usage figures.
- d. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to

comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The following terms and conditions shall become void after U.S. EPA approves the rule revision:

d)(8), e)(3)a.ii. and e)(3)a.iii.

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(s) was/were 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 permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (7) The permittee shall maintain monthly records of the following information:
 - a. the coating and clean-up usage for each month; and
 - b. the rolling, 12-month summation of the coating and clean-up usage.
- (8) The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;

- b. the number of gallons of each coating and photochemically reactive cleanup material employed;
- c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
- d. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), 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).]

- (9) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s), K002, K003, K004 and K005, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute," ORC 3704.03(F), was applied to this/these emissions unit(s) 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(s), (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., 8 hours per day and 7 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):

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

- 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

Maximum Hourly Emission Rate (lbs/hr): 1.33

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 280

MAGLC (ug/m³): 1,780

The permittee, has demonstrated that emissions of toluene, from emissions unit(s) K002, K003, K004 and K005, 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).

- (10) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration," the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC 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.

(11) 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.

(12) 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.

e) 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) 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.

- (3) 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. the permittee shall not use more than 3,520 gallons of coating material and 55 gallons of cleanup material per rolling, 12-month period
 - ii. an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day; and
 - iii. an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day
 - 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 appropriate District Office or local air agency).

- (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(6) above:
- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
 - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - c. any corrective actions taken to minimize or eliminate the visible particulate emissions from the stack and/or visible emissions of fugitive dust.

- (5) The permittee shall include any changes made to a parameter or value used in the dispersion model, 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, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.
- f) Testing Requirements
- (1) Compliance with the emission limitations in Section b)(1) of the terms and condition of this permit shall be determined in accordance with the following methods:
- a. Emission Limitation:
1.45 pounds of particulate emission (PE) per hour
- Applicable Compliance Method:
The emission limitation was established by multiplying the gallons per hour usage of coating by the density of the coating then by the percent of solids in the coating. Then multiply the product by a transfer control efficiency of 70% and a paint booth efficiency of 80%.
- b. Emission Limitation:
2.11 tons of PE per rolling, 12-month period
- Applicable Compliance Method:
The emission limitation was established by multiplying the maximum annual coating usage of 1,855 gallons by the density of the coating then by the percent solids in the coating. Then multiply the product by a transfer control efficiency of 70% and a paint booth efficiency of 80%.
- c. Emission Limitation:
6.16 pounds of volatile organic compounds (VOCs) per hour
- Applicable Compliance Method:
The emission limitation was established by multiplying the hourly usage of coating and cleanup materials by the VOC density per gallon of the materials.
- d. Emission Limitation:
8.99 tons of VOC per rolling, 12-month period
- Applicable Compliance Method
The emission limitation was established by multiplying the maximum annual coating usage by the VOC density per gallon of the coating and a conversion factor of 1 ton/2,000 lbs. The product was then added to the product found by multiplying the maximum annual usage of cleanup materials by the VOC density per gallon of the cleanup materials and a conversion factor of 1 ton/2,000 lbs.
- e. Emission Limitation:
Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule; and visible

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N WASSERSTROM & SONS INC

Permit Number: P0106738

Facility ID: 0125040342

Effective Date: To be entered upon final issuance

emissions from fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) None.