

Facility ID: 0448011193 Issuance type: Title V Preliminary Proposed Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

1. The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in Subpart QQQQ of 40 CFR Part 63 (Surface Coating of Wood Building Products) in accordance with 40 CFR Parts 63.4680 - 63.4781 including the Table(s) and Appendix(ices) referenced in Subpart QQQQ, which are included in the text of Attachment 1 hereto, and are hereby incorporated into this permit as if fully written. Ordinarily, these requirements would be incorporated into Part II of this Title V permit; however, incorporating Subpart QQQQ into Part II of this Title V permit was not practical due to technical incompatibilities and the limitations of the STARS program. In addition, numerous difficulties were encountered in attempting to copy and paste the Subpart's tables and/or equations into STARS format.

The following emissions unit in this permit is subject to the aforementioned requirements: K001.

(Authority for term: 40 CFR Part 63, Subpart QQQQ and OAC rule 3745-77-07(C)(1))

2. The permittee is subject to the applicable requirements specified in Subpart A of 40 CFR Part 63 (General Provisions) in accordance with 40 CFR Parts 63.1 - 63.15 as referenced in 40 CFR Part 63, Subpart QQQQ, Table 4, which is included in the text of Attachment 1 hereto, and is hereby incorporated into this permit as if fully written.

The following emissions unit in this permit is subject to the aforementioned requirements: K001.

(Authority for term: 40 CFR Part 63, Subparts A and QQQQ and OAC rule 3745-77-07(C)(1))

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### b State Only Enforceable Section

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z001 - laminating line; and  
Z002 - QC laboratory.

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 0448011193 Emissions Unit ID: K001 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
hardboard finishing line with eight thermal incinerators	OAC rule 3745-31-05(A)(3) (PTI 04-00204)	See section A.I.2.a below.
	OAC rules 3745-31-21 through 27	Emissions of volatile organic compounds (VOC) shall not exceed 3.29 pounds per gallon of coating solids.
		Emissions of VOC shall not exceed 90 tons per rolling, 3-month period.
	OAC rule 3745-21-07(G), (G)(1), (G)(2)	See section A.I.2.b below.
	OAC rule 3745-21-07(G)(6) OAC rule 3745-21-07 (G)(9)(c), (d)	See section A.I.2.c below. exemption
		See section A.I.2.d below.
	40 CFR Part 63, Subparts A and QQQQ	See Part II, sections A.1 and A.2, Part III, section A.I.2.e, and Attachment 1.

**2. Additional Terms and Conditions**

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07 (G), (G)(1), (G)(2), (G)(6), (G)(9)(c) and (d), 3745-31-21 thru 27 and 40 CFR Part 63, Subparts A and QQQQ.
- b. The permittee shall reduce the overall emissions of photochemically reactive materials by at least eighty-five per cent.
- c. The permittee shall reduce the emissions of organic material by incineration, provided that ninety per cent or more of the carbon in the organic material being incinerated is oxidized to carbon dioxide.
- d. The permittee shall be exempted from compliance with the requirements of OAC rule 3745-21-07(G) on any day in which all coatings utilized comply with the exemption requirements of OAC rule 3745-21-07 (G)(9)(c) or (d).
- e. The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subparts A and QQQQ. The compliance date for this emissions unit is May 28, 2006.

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**II. Operational Restrictions**

1. The maximum coating usage for this emissions unit shall not exceed 54,700 gallons of applied coating solids, based upon a rolling, 3-month summation of the coating usage figures.  
  
(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))
2. For all periods of time during which a thermal incinerator is in use as a control device, the average combustion temperature within that thermal incinerator, for any 3-hour block of time, shall not be more than 50 degrees

Fahrenheit below the average temperature measured during the most recent emission test that demonstrated compliance with the emission limitations.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

3. The permittee may bypass the thermal incinerators when utilizing coating materials complying with the exemptions of OAC rule 3745-21-07(G)(9)(c) or (d), provided compliance can be demonstrated with the requirements of the Lowest Achievable Emission Rate (LAER) limitations established by OAC rules 3745-31-21 through 27.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

4. Should any coating formulations or process changes cause an increase in the quantity or intensity of odors emitted from this facility in violation of OAC rule 3745-15-07, as determined by the Toledo Division of Environmental Services, the company shall take corrective action to reduce the impact of the odors. The time schedule for the corrective action shall be approved by the Toledo Division of Environmental Services.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

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### III. **Monitoring and/or Record Keeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within each thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitors and recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

2. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within any thermal incinerator, when such thermal incinerator was in use as a control device, was more than 50 degrees Fahrenheit below the average temperature of that incinerator measured during the most recent emission test that demonstrated compliance with the emission limitations; and

b. a log of the downtime for the capture (collection) system(s), control device(s), and monitoring equipment, when the associated emissions source (coating station) was in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

3. The permittee shall collect and record the following information monthly for all coating station(s) for each period of time during which the associated thermal incinerator was bypassed:

a. the company identification for each thermal incinerator which was bypassed;

b. the date and time period during which each thermal incinerator was bypassed;

c. the company identification of each coating and cleanup material employed;

d. documentation demonstrating that each coating complies with the exemptions of OAC rule 3745-21-07 (G)(9)(c) or (d);

e. the VOC content of each cleanup material, in pounds per gallon;

f. the number of gallons of each cleanup material employed;

g. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;

h. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;

i. the total VOC emissions for each period of time, in tons; and

j. the total volume of solids applied for each period of time, in gallons.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

4. The permittee shall collect and record the following information monthly for all coating station(s) for each period of time during which the associated thermal incinerator was in use as a control device:

a. the company identification for each thermal incinerator which was in use;

b. the total time, in hours, during which each thermal incinerator was in use as a control device, cumulating from the completion of the most recent emission test which demonstrated compliance with the emission limitations;

c. the company identification for each coating and cleanup material employed;

- d. the pounds of VOC per gallon of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating;
- e. the maximum VOC content (in pounds of VOC per gallon of coating solids, as applied) or the daily volume-weighted average VOC content (in pounds of VOC per gallon of coating solids, as applied) of all the coatings;
- f. the calculated, controlled VOC emission rate, in pounds of VOC per gallon of coating solids, as applied. The controlled VOC emission rate shall be calculated using (i) either the maximum VOC content or the daily volume-weighted VOC content recorded in accordance with paragraph (e) above and (ii) the overall control efficiency for the control equipment as determined during the most recent emission test that demonstrated that the emissions unit was in compliance;
- g. the number of gallons of each cleanup material employed;
- h. the VOC content of each cleanup material, in pounds per gallon;
- i. the total controlled VOC emissions, in tons; and
- j. the total volume of solids applied for each period of time, in gallons.
- (Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
5. The permittee shall collect and record the following information each month:
- a. the total of the uncontrolled and controlled VOC emissions, i.e., the sum of (3)(i) plus (4)(i) for all time periods, in tons;
- b. the total of the uncontrolled and controlled VOC emissions, in tons, as a rolling, 3-month summation;
- c. the coating usage, i.e., the sum of (3)(j) plus (4)(j) for all time periods, in gallons of applied coating solids; and
- d. the rolling, 3-month summation of the coating usage, in gallons of applied coating solids.
- (Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

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**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within any thermal incinerator which was in use as a control device, does not comply with the temperature limitation specified above.
- (Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
2. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time when the VOC emissions did not comply with the allowable limitation of 3.29 pounds of VOC per gallon of applied coating solids.
- (Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
3. The permittee shall submit quarterly deviation (excursion) reports that identify all months during which the rolling, 3-month coating usage did not comply with the allowable limitation of 54,700 gallons of applied coating solids.
- (Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
4. The permittee shall submit quarterly emission deviation (excursion) reports that identify all months during which the VOC emissions did not comply with the allowable limitation of 90 tons of VOC per rolling, 3-month period.
- (Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
5. The permittee shall submit quarterly emission deviation (excursion) reports that identify all periods of time during which a thermal incinerator was bypassed and the coating utilized did not comply with the exemptions of OAC rule 3745-21-07(G)(9)(c) or (d).
- (Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
6. The permittee shall submit quarterly summary reports that identify the total time, in hours, during which each thermal incinerator was in use as a control device, cumulating from the completion of the most recent emission test which demonstrated compliance with the emission limitations.
- (Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
7. These reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions A.2 and B.9.
- (Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

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V. **Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:

3.29 pounds of VOC per gallon of applied coating solids

Applicable Compliance Method:

Compliance shall be demonstrated through the required record keeping specified in section A.III. The overall control efficiency used shall be the efficiency determined during the most recent emission test which demonstrated compliance. Coating VOC concentrations shall be determined in accordance with USEPA Methods 24 and 24A. If, pursuant to Section 11.4 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
  - b. Emission Limitation:

90 tons of VOC per rolling, 3-month period

Applicable Compliance Method:

Compliance shall be demonstrated through the required record keeping specified in section A.III.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
  - c. Emission Limitation:

compliance with the exemptions of OAC rule 3745-21-07(G)(9)(c) or (d)

Applicable Compliance Method:

Compliance shall be demonstrated through the required record keeping specified in section A.III. Coating VOC concentrations shall be determined in accordance with USEPA Methods 24 and 24A. If, pursuant to Section 11.4 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The permittee shall provide written notification to the Toledo Division of Environmental Services, if requesting an exemption from testing due to the use of coatings in compliance with OAC rule 3745-21-07(G)(9)(c) or (d). Any incinerator which is not tested due to this exemption, shall be tested within 90 days of returning to the regular usage of coatings subject to OAC rule 3745-21-07(G)(6).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
- b. Emission testing for the overall control efficiency of each incinerator shall be conducted every 2.5 years, or after every 10,000 hours (approximate) of operation, whichever is less stringent. If the applicable incinerator has not been tested in the previous 10,000 hours of operation as a control device, and the incinerator is utilized as a control device for a period of 30 consecutive days, the permittee shall perform emission testing on that incinerator within 60 days.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- c. The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10(C). The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases. Alternative U.S. EPA-approved test methods can be used with prior approval from Ohio EPA.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- d. Capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.)

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- e. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Toledo Division of Environmental Services.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Toledo Division of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Toledo Division of Environmental Service's refusal to accept the results of the emission test(s).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- g. Personnel from the Toledo Division of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- h. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Toledo Division of Environmental Services.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

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VI. **Miscellaneous Requirements**

- 1. Coating formulation changes can be made by the permittee provided the emission limitations of this permit are not exceeded.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

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**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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- 2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None