



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: DRAFT PERMIT TO INSTALL
VAN WERT COUNTY
Application No: 03-3212**

CERTIFIED MAIL

X	TOXIC REVIEW
	PSD
X	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: October 6, 1999

National Door and Trim, Inc.
Rick Andreson
108 South Zimmerman Avenue
Van Wert, OH 45891

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

cc: USEPA
DAPC, NWDO
Indiana Office of Air Management
Michigan Department of Environmental Quality



DRAFT PERMIT TO INSTALL 03-3212

Application Number: 03-3212

APS Premise Number: 0381020040

Permit Fee: **To be entered upon final issuance**

Name of Facility: National Door and Trim, Inc.

Person to Contact: Rick Andreson

Address: 108 South Zimmerman Avenue
Van Wert, OH 45891

Location of proposed air contaminant source(s) [emissions unit(s)]:

**1189 Grill Road
Van Wert, Ohio**

Description of proposed emissions unit(s):

PAINT BOOTHS AND ASSOCIATED CLEANUP.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may

be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

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

14. Construction Compliance Certification

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

National Door and Trim, Inc.

Facility ID: **0381020040**

PTI Application: **03-3212**

Date: To be entered upon final issuance

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	9.9

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Door Line Booth #1	OAC rule 3745-31-05(A)	9.1 lbs Organic Compounds (OC)/hr
	OAC rule 3745-31-05(D) synthetic minor to avoid Title V/MACT applicability	Group Limit 9.9 tons OC/yr, based on gallon usage restrictions (See B.2.)
	OAC rule 3745-21-07(G)	none (See B.3.)

2. **Additional Terms and Conditions**

- 2a None.

B. Operational Restrictions

1. The maximum OC contents of the coatings employed in emissions units R001, R002, R003, R004, and R005 shall not exceed the following:
 - a. stains - 0.6 lbs of OC per gallon of coating, as applied;
 - b. all other coatings, including paints, sealers, topcoats, ect.- 1.3 lbs of OC per gallon of coating, as applied.
2. The maximum annual coating usage for emissions units R001, R002, R003, R004, and R005 as a group shall not exceed **any** of the following:
 - a. 10,200 gallons of coatings with a maximum OC content of 1.3 lbs of OC per gallon of coating;
 - b. 21,100 gallons of coatings with a maximum OC content of 0.6 lbs of OC per gallon of coating; and,

- c. 21,100 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating input rates.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the coating input rates specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Input Rates (Gallons)</u>		
	<u>1.3 lbs OC/gal</u>	<u>0.6 lbs OC/gal</u>	<u>Combined</u>
1	1200	2500	2500
1-2	2200	4500	4500
1-3	3200	6500	6500
1-4	4200	8500	8500
1-5	5200	10500	10500
1-6	6200	12500	12500
1-7	7200	14500	14500
1-8	8200	16500	16500
1-9	9200	18500	18500
1-12	10200	21100	21100

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating input rates in gallons.

- 3. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
- 4. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Ethylene-Glycol N-butyl Ether (2-Butoxy Ethanol)

TLV (ug/m3): 120,828

Maximum Hourly Emission Rate (lbs/hr): 8.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1326*

MAGLC (ug/m3):2,877

*This was modeled as a sum from emissions units R001-R005

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and,
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.
3. The permittee shall collect and record the following information each month for emissions units R001, R002, R003, R004, and R005, as a group:
 - a. the company identification for each coating employed;
 - b. the OC content of each coating, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the OC emission rate for each coating (b x c), in tons per month;
 - e. the total OC emission rate for all coatings (summation of d), in tons per month;
 - f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of OC, in tons per month; and,
 - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of OC, based on a rolling, 12-month summation.
4. In addition to the above information, the permittee shall also record the following information each month for emissions units R001, R002, R003, R004, and R005, as a group:
 - a. for the first 12 months of operation under the provisions of this permit:
 - i. the cumulative gallon input rate for each coating;
 - ii. the total number of gallons of coatings with a maximum OC content of 1.3 lbs of OC/gallon of coating;

- iii. the total number of gallons of coatings with a maximum OC content of 0.6 lbs of OC/gallon of coating; and,
 - iv. the total number of gallons of all coatings.
- b. after the first 12 months of operation under the provisions of this permit:
- i. the annual* number of gallons of each coating;
 - ii. the annual * number of gallons of coatings with a maximum OC content of 1.3 lbs of OC/gallon of coating;
 - iii. the annual* number of gallons of coatings with a maximum OC content of 0.6 lbs of OC/gallon of coating; and,
 - iv. the annual* number of gallons of all coatings.

*Based upon a rolling 12-month summation of the coating input rates.

Note: The coating information recorded above must be for the materials as employed, including any thinning solvents added at the emissions units.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any the following:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable gallon input rates;
 - b. the annual gallon usage restrictions and emission limitation from emissions units R001, R002, R003, R004, and R005 per rolling 12 month period; and,
 - c. the OC content restrictions.
2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed.

E. Testing Requirements

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

Emission Limitation-
9.1 lbs OC/hr

Applicable Compliance Method-

The hourly OC limit is based on the emissions unit's potential to emit i.e., the maximum usage rate of 7.0 gallons of coating per hour at the maximum OC content of 1.3 lb/gallon. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limit.

Emission Limitation-

Group limit for emissions units R001, R002, R003, R004, and R005 of 9.9 tons OC/yr

Applicable Compliance Method-

Compliance shall be based on the recordkeeping requirements as specified in C.3. and C.4.

2. Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the materials.
3. The permittee shall submit reports, on an annual basis, that summarize the total OC emissions for emissions units R001, R002, R003, R004, and R005 during the previous calendar year. These reports shall be submitted by January 31 of each year.

F. Miscellaneous Requirements

None.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Door Line Booth #2	OAC rule 3745-31-05(A)	4.4 lbs Organic Compounds (OC)/hr
	OAC rule 3745-31-05(D) synthetic minor to avoid Title V/MACT applicability	Group Limit 9.9 tons OC/yr, based on gallon usage restrictions (See B.2.)
	OAC rule 3745-21-07(G)	none (See B.3.)

2. **Additional Terms and Conditions**

- 2.a None.

B. Operational Restrictions

1. The maximum OC contents of the coatings employed in emissions units R001, R002, R003, R004, and R005 shall not exceed the following:
 - a. stains - 0.6 lbs of OC per gallon of coating, as applied;
 - b. all other coatings, including paints, sealers, topcoats, ect.- 1.3 lbs of OC per gallon of coating, as applied.
2. The maximum annual coating usage for emissions units R001, R002, R003, R004, and R005 as a group shall not exceed **any** of the following:
 - a. 10,200 gallons of coatings with a maximum OC content of 1.3 lbs of OC per gallon of coating;
 - b. 21,100 gallons of coatings with a maximum OC content of 0.6 lbs of OC per gallon of coating;

- c. 21,100 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating input rates.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the coating input rates specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Input Rates (Gallons)</u>		
	<u>1.3 lbs OC/gal</u>	<u>0.6 lbs OC/gal</u>	<u>Combined</u>
1	1200	2500	2500
1-2	2200	4500	4500
1-3	3200	6500	6500
1-4	4200	8500	8500
1-5	5200	10500	10500
1-6	6200	12500	12500
1-7	7200	14500	14500
1-8	8200	16500	16500
1-9	9200	18500	18500
1-12	10200	21100	21100

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating input rates in gallons.

- 3. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
- 4. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Ethelene-Glycol N-butyl Ether (2-Butoxy Ethanol)

TLV (ug/m3): 120,828

Maximum Hourly Emission Rate (lbs/hr): 8.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1326*

MAGLC (ug/m3):2,877

*This was modeled as a sum from emissions units R001-R005

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
2. The permittee shall maintain records of the following information for this emissions unit:
- a. the company identification for each liquid organic material employed in this emissions unit; and,
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.
3. The permittee shall collect and record the following information each month for emissions units R001, R002, R003, R004, and R005, as a group:
- a. the company identification for each coating employed;
 - b. the OC content of each coating, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the OC emission rate for each coating (b x c), in tons per month;
 - e. the total OC emission rate for all coatings (summation of d), in tons per month;
 - f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of OC, in tons per month; and,
 - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of OC, based on a rolling, 12-month summation.
4. In addition to the above information, the permittee shall also record the following information each month for emissions units R001, R002, R003, R004, and R005, as a group:
- a. for the first 12 months of operation under the provisions of this permit:
 - i. the cumulative gallon input rate for each coating;
 - ii. the total number of gallons of coatings with a maximum OC content of 1.3 lbs of OC/gallon of coating;
 - iii. the total number of gallons of coatings with a maximum OC content of 0.6 lbs of OC/gallon of coating; and,
 - iv. the total number of gallons of all coatings.

- b. after the first 12 months of operation under the provisions of this permit:
 - i. the annual* number of gallons of each coating;
 - ii. the annual * number of gallons of coatings with a maximum OC content of 1.3 lbs of OC/gallon of coating;
 - iii. the annual* number of gallons of coatings with a maximum OC content of 0.6 lbs of OC/gallon of coating; and,
 - iv. the annual* number of gallons of all coatings.

*Based upon a rolling 12-month summation of the coating input rates.

Note: The coating/cleanup information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify exceedances of any the following emissions limits:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable gallon input rates;
 - b. the annual gallon usage restrictions and emission limitation from emissions units R001, R002, R003, R004, and R005 per rolling 12 month period; and,
 - c. the OC content restrictions.
- 2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed.
- 3. The permittee shall submit reports, on an annual basis, that summarize the total OC emissions for emissions units R001, R002, R003, R004, and R005 during the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

Emission Limitation-
4.4 lbs OC/hr

Applicable Compliance Method-

National Door and Trim, Inc.

PTI Application: **03-3212**

Date: To be entered upon final issuance

Facility ID: **0381020040**

Emissions Unit ID: **R002**

The hourly OC limit is based on the emissions unit's potential to emit i.e., the maximum usage rate of 7.25 gallons of coating per hour at the maximum OC content of 0.6 lb/gallon. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limit.

Emission Limitation-

Group limit for emissions units R001, R002, R003, R004, and R005 of 9.9 tons OC/yr

Applicable Compliance Method-

Compliance shall be based on the recordkeeping requirements as specified in C.3. and C.4.

2. Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the materials.

F. Miscellaneous Requirements

None.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Door Line Booth #3	OAC rule 3745-31-05(A)	9.4 lbs Organic Compounds (OC)/hr
	OAC rule 3745-31-05(D) synthetic minor to avoid Title V/MACT applicability	Group Limit 9.9 tons OC/yr, based on gallon usage restrictions (See B.2.)
	OAC rule 3745-21-07(G)	none (See B.3.)

2. **Additional Terms and Conditions**

- 2.a None.

B. Operational Restrictions

1. The maximum OC contents of the coatings employed in emissions units R001, R002, R003, R004, and R005 shall not exceed the following:
 - a. stains - 0.6 lb of OC per gallon of coating, as applied; and,
 - b. all other coatings, including paints, sealers, topcoats, ect.- 1.3 lbs of OC per gallon of coating, as applied.
2. The maximum annual coating usage for emissions units R001, R002, R003, R004, and R005 as a group shall not exceed **any** of the following:
 - a. 10,200 gallons of coatings with a maximum OC content of 1.3 lbs of OC per gallon of coating;

- b. 21,100 gallons of coatings with a maximum OC content of 0.6 lbs of OC per gallon of coating; and,
- c. 21,100 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating input rates.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the coating input rates specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Input Rates (Gallons)</u>		
	<u>1.3 lbs OC/gal</u>	<u>0.6 lbs OC/gal</u>	<u>Combined</u>
1	1200	2500	2500
1-2	2200	4500	4500
1-3	3200	6500	6500
1-4	4200	8500	8500
1-5	5200	10500	10500
1-6	6200	12500	12500
1-7	7200	14500	14500
1-8	8200	16500	16500
1-9	9200	18500	18500
1-12	10200	21100	21100

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating input rates in gallons.

- 3. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
- 4. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Ethelene-Glycol N-butyl Ether (2-Butoxy Ethanol)
 TLV (ug/m3): 120,828

Maximum Hourly Emission Rate (lbs/hr): 8.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1326*

MAGLC (ug/m3):2,877

*This was modeled as a sum from emissions units R001-R005

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a “modification”:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a “modification” requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a “modification” under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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

C. Monitoring and/or Recordkeeping Requirements

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

2. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and,
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

3. The permittee shall collect and record the following information each month for emissions units R001, R002, R003, R004, and R005, as a group:
 - a. the company identification for each coating employed;
 - b. the OC content of each coating, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the OC emission rate for each coating (b x c), in tons per month;
 - e. the total OC emission rate for all coatings (summation of d), in tons per month;
 - f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of OC, in tons per month; and,
 - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of OC, based on a rolling, 12-month summation.

4. In addition to the above information, the permittee shall also record the following information each month for emissions units R001, R002, R003, R004, and R005, as a group:
 - a. for the first 12 months of operation under the provisions of this permit:
 - i. the cumulative gallon input rate for each coating;
 - ii. the total number of gallons of coatings with a maximum OC content of 1.3 lbs of OC/gallon of coating;

- iii. the total number of gallons of coatings with a maximum OC content of 0.6 lb of OC/gallon of coating; and,
 - iv. the total number of gallons of all coatings.
- b. after the first 12 months of operation under the provisions of this permit:
- i. the annual* number of gallons of each coating;
 - ii. the annual * number of gallons of coatings with a maximum OC content of 1.3 lbs of OC/gallon of coating;
 - iii. the annual* number of gallons of coatings with a maximum OC content of 0.6 lb of OC/gallon of coating; and,
 - iv. the annual* number of gallons of all coatings.

*Based upon a rolling 12-month summation of the coating input rates.

Note: The coating/cleanup information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify exceedances of any the following emissions limits:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable gallon input rates;
 - b. the annual gallon usage restrictions and emission limitation from emissions units R001, R002, R003, R004, and R005 per rolling 12 month period; and,
 - c. the OC content restrictions.
2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed.
3. The permittee shall submit reports, on an annual basis, that summarize the total OC emissions for emissions units R001, R002, R003, R004, and R005 during the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

National Door and Trim, Inc.

PTI Application: **03-3212**

Date: To be entered upon final issuance

Facility ID: **0381020040**

Emissions Unit ID: **R003**

Emission Limitation-

9.4 lbs OC/hr

Applicable Compliance Method-

The hourly OC limit is based on the emissions unit's potential to emit i.e., the maximum usage rate of 7.25 gallons of coating per hour at the maximum OC content of 1.3 lbs/gallon. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limit.

Emission Limitation-

Group limit for emissions units R001, R002, R003, R004, and R005 of 9.9 tons OC/yr

Applicable Compliance Method-

Compliance shall be based on the recordkeeping requirements as specified in C.3. and C.4.

2. Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the materials.

F. Miscellaneous Requirements

None.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Trim Line Booth #1	OAC rule 3745-31-05(A)	2.1 lbs Organic Compounds (OC)/hr & 9.2 tons OC/yr
	OAC rule 3745-31-05(D) synthetic minor to avoid Title V/MACT applicability	Group Limit 9.9 tons OC/yr, based on gallon usage restrictions (See B.2.)
	OAC rule 3745-21-07(G)	none (See B.3.)

2. **Additional Terms and Conditions**

- 2.a None.

B. Operational Restrictions

1. The maximum OC contents of the coatings employed in emissions units R001, R002, R003, R004, and R005 shall not exceed the following:
 - a. stains - 0.6 lb of OC per gallon of coating, as applied; and,
 - b. all other coatings, including paints, sealers, topcoats, ect.- 1.3 lbs of OC per gallon of coating, as applied.
2. The maximum annual coating usage for emissions units R001, R002, R003, R004, and R005 as a group shall not exceed **any** of the following:
 - a. 10,200 gallons of coatings with a maximum OC content of 1.3 lbs of OC per gallon of coating;
 - b. 21,100 gallons of coatings with a maximum OC content of 0.6 lbs of OC per gallon of coating; and,

- c. 21,100 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating input rates.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the coating input rates specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Input Rates (Gallons)</u>		
	<u>1.3 lbs OC/gal</u>	<u>0.6 lb OC/gal</u>	<u>Combined</u>
1	1200	2500	2500
1-2	2200	4500	4500
1-3	3200	6500	6500
1-4	4200	8500	8500
1-5	5200	10500	10500
1-6	6200	12500	12500
1-7	7200	14500	14500
1-8	8200	16500	16500
1-9	9200	18500	18500
1-12	10200	21100	21100

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating input rates in gallons.

- 3. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
- 4. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Ethelene-Glycol N-butyl Ether (2-Butoxy Ethanol)

TLV (ug/m3): 120,828

Maximum Hourly Emission Rate (lbs/hr): 8.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1326*

MAGLC (ug/m3):2,877

*This was modeled as a sum from emissions units R001-R005

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a “modification”:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a “modification” requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a “modification” under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
2. The permittee shall maintain records of the following information for this emissions unit:
- a. the company identification for each liquid organic material employed in this emissions unit; and,
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.
3. The permittee shall collect and record the following information each month for emissions units R001, R002, R003, R004, and R005, as a group:
- a. the company identification for each coating employed;
 - b. the OC content of each coating, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the OC emission rate for each coating (b x c), in tons per month;
 - e. the total OC emission rate for all coatings (summation of d), in tons per month;
 - f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of OC, in tons per month; and,
 - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of OC, based on a rolling, 12-month summation.
4. In addition to the above information, the permittee shall also record the following information each month for emissions units R001, R002, R003, R004, and R005, as a group:
- a. for the first 12 months of operation under the provisions of this permit:
 - i. the cumulative gallon input rate for each coating;
 - ii. the total number of gallons of coatings with a maximum OC content of 1.3 lbs of OC/gallon of coating;
 - iii. the total number of gallons of coatings with a maximum OC content of 0.6 lbs of OC/gallon of coating; and,
 - iv. the total number of gallons of all coatings.

- b. after the first 12 months of operation under the provisions of this permit:
 - i. the annual* number of gallons of each coating;
 - ii. the annual * number of gallons of coatings with a maximum OC content of 1.3 lbs of OC/gallon of coating;
 - iii. the annual* number of gallons of coatings with a maximum OC content of 0.6 lbs of OC/gallon of coating; and,
 - iv. the annual* number of gallons of all coatings.

*Based upon a rolling 12-month summation of the coating input rates.

Note: The coating/cleanup information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify exceedances of any the following emissions limits:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable gallon input rates;
 - b. the annual gallon usage restrictions and emission limitation from emissions units R001, R002, R003, R004, and R005 per rolling 12 month period; and,
 - c. the OC content restrictions.
- 2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed.
- 3. The permittee shall submit reports, on an annual basis, that summarize the total OC emissions for emissions units R001, R002, R003, R004, and R005 during the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

Emission Limitation-
2.1 lbs OC/hr & 9.2 tons OC/yr

Applicable Compliance Method-

National Door and Trim, Inc.

PTI Application: **03-3212**

Date: To be entered upon final issuance

Facility ID: **0381020040**

Emissions Unit ID: **R004**

The hourly and annual OC limits are based on the emissions unit's potential to emit i.e., the maximum usage rate of 3.5 gallons of coating per hour at the maximum OC content of 0.6 lb/gallon, and an operating schedule of 8760 hrs/yr. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits.

Emission Limitation-

Group limit for emissions units R001, R002, R003, R004, and R005 of 9.9 tons OC/yr

Applicable Compliance Method-

Compliance shall be based on the recordkeeping requirements as specified in C.3. and C.4.

2. Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the materials.

F. Miscellaneous Requirements

None.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Trim Line Booth #2	OAC rule 3745-31-05(A)	5.9 lbs Organic Compounds (OC)/hr
	OAC rule 3745-31-05(D) synthetic minor to avoid Title V/MACT applicability	Group Limit 9.9 tons OC/yr, based on gallon usage restrictions (See B.2.)
	OAC rule 3745-21-07(G)	none (See B.3.)

2. **Additional Terms and Conditions**

- 2.a None.

B. Operational Restrictions

1. The maximum OC contents of the coatings employed in emissions units R001, R002, R003, R004, and R005 shall not exceed the following:
 - a. stains - 0.6 lb of OC per gallon of coating, as applied;
 - b. all other coatings, including paints, sealers, topcoats, ect.- 1.3 lbs of OC per gallon of coating, as applied.
2. The maximum annual coating usage for emissions units R001, R002, R003, R004, and R005 as a group shall not exceed **any** of the following:
 - a. 10,200 gallons of coatings with a maximum OC content of 1.3 lbs of OC per gallon of coating;
 - b. 21,100 gallons of coatings with a maximum OC content of 0.6 lb of OC per gallon of coating; and,

- c. 21,100 gallons for all coatings combined.

The annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating input rates.

To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, the permittee shall not exceed the coating input rates specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Input Rates (Gallons)</u>		
	<u>1.3 lbs OC/gal</u>	<u>0.6 lb OC/gal</u>	<u>Combined</u>
1	1200	2500	2500
1-2	2200	4500	4500
1-3	3200	6500	6500
1-4	4200	8500	8500
1-5	5200	10500	10500
1-6	6200	12500	12500
1-7	7200	14500	14500
1-8	8200	16500	16500
1-9	9200	18500	18500
1-12	10200	21100	21100

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coating usage limitations shall be based upon a rolling, 12-month summation of the coating input rates in gallons.

- 3. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
- 4. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: Ethelene-Glycol N-butyl Ether (2-Butoxy Ethanol)

TLV (ug/m3): 120,828

Maximum Hourly Emission Rate (lbs/hr): 8.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1326*

MAGLC (ug/m3):2,877

*This was modeled as a sum from emissions units R001-R005

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a “modification”:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

The Ohio EPA will not consider any of the above-mentioned as a “modification” requiring a permit to install, if the following conditions are met:

- a. the change is not otherwise considered a “modification” under OAC Chapter 3745-31;
- b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:

- a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.
2. The permittee shall maintain records of the following information for this emissions unit:
- a. the company identification for each liquid organic material employed in this emissions unit; and,
 - b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.
3. The permittee shall collect and record the following information each month for emissions units R001, R002, R003, R004, and R005, as a group:
- a. the company identification for each coating employed;
 - b. the OC content of each coating, in pounds per gallon;
 - c. the number of gallons of each coating employed;
 - d. the OC emission rate for each coating (b x c), in tons per month;
 - e. the total OC emission rate for all coatings (summation of d), in tons per month;
 - f. for the first 12 months of operation under the provisions of this permit, the cumulative monthly emission rate of OC, in tons per month; and,
 - g. after the first 12 months of operation under the provisions of this permit, the annual emissions of OC, based on a rolling, 12-month summation.
4. In addition to the above information, the permittee shall also record the following information each month for emissions units R001, R002, R003, R004, and R005, as a group:
- a. for the first 12 months of operation under the provisions of this permit:
 - i. the cumulative gallon input rate for each coating;
 - ii. the total number of gallons of coatings with a maximum OC content of 1.3 lbs of OC/gallon of coating;
 - iii. the total number of gallons of coatings with a maximum OC content of 0.6 lbs of OC/gallon of coating; and
 - iv. the total number of gallons of all coatings.

- b. after the first 12 months of operation under the provisions of this permit:
 - i. the annual* number of gallons of each coating;
 - ii. the annual * number of gallons of coatings with a maximum OC content of 1.3 lbs of OC/gallon of coating;
 - iii. the annual* number of gallons of coatings with a maximum OC content of 0.6 lbs of OC/gallon of coating; and,
 - iv. the annual* number of gallons of all coatings.

*Based upon a rolling 12-month summation of the coating input rates.

Note: The coating/cleanup information recorded above must be for the materials as employed, including any thinning solvents added at the emissions unit.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify exceedances of any the following emissions limits:
 - a. for the first 12 calendar months of operation, all exceedances of the maximum allowable gallon input rates;
 - b. the annual gallon usage restrictions and emission limitation from emissions units R001, R002, R003, R004, and R005 per rolling 12 month period; and,
 - c. the OC content restrictions.
- 2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed.
- 3. The permittee shall submit reports, on an annual basis, that summarize the total OC emissions for emissions units R001, R002, R003, R004, and R005 during the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

Emission Limitation-
5.9 lbs OC/hr

Applicable Compliance Method-

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The hourly OC limit is based on the emissions unit's potential to emit i.e., the maximum usage rate of 4.5 gallons of coating per hour at the maximum OC content of 1.3 lb/gallon. Therefore, no recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limit.

Emission Limitation-

Group limit for emissions units R001, R002, R003, R004, and R005 of 9.9 tons OC/yr

Applicable Compliance Method-

Compliance shall be based on the recordkeeping requirements as specified in C.3. & C.4.

2. Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the materials.

F. Miscellaneous Requirements

None.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Facility-Wide Cleanup Operations	OAC rule 3745-31-05(A)	0.66 ton Organic Compounds (OC)/yr
	OAC rule 3745-21-07	none (See B.1.)

2. **Additional Terms and Conditions**

- 2.a None.

B. Operational Restrictions

1. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
2. Pursuant to Engineering Guide #69, modeling to demonstrate compliance with the Ohio EPA’s Air Toxic Policy was not necessary since the emissions unit’s maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a “modification” as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the following information for this emissions unit:
 - a. the company identification for each liquid organic material employed in this emissions unit; and,

- b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.
2. The permittee shall collect and record the following information each month for emissions unit P801:
 - a. the company identification for each cleanup material employed;
 - b. the OC content of each cleanup material, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emission rate for each cleanup material (b x c), in tons;
 - e. the total OC emission rate for all cleanup materials (summation of d), in tons; and,
 - f. the annual year-to-date emissions for all cleanup materials, in tons

D. Reporting Requirements

1. The permittee shall submit an annual deviation (excursion) reports which identify exceedances of the annual emissions limitation. This report shall be due by January 31 of each year.
2. The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed.
3. The permittee shall submit reports, on an annual basis, that summarize the total OC emissions for emissions units P801 during the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

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

Emission Limitation-
0.66 ton OC/yr

Applicable Compliance Method-
Compliance shall be based on the recordkeeping requirements as specified in C.2.

2. Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the materials.

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Facility ID: **0381020040**

Emissions Unit ID: **P801**

F. Miscellaneous Requirements

None.