

Synthetic Minor Determination and/or Netting Determination

Permit To Install 16-02448

A. Source Description

Baker McMillen is an existing facility located in Stow Ohio, Summit County. The facility consists of 3 spray booths, 2 dip tanks, and a woodworking operation, P001, P003 - P004 and R002 - R004. Baker McMillen is installing a stain machine, P005. Baker McMillen desires to limit the facility's volatile organic emissions, individual HAP, and combined HAPs to less than Title V thresholds.

B. Facility Emissions

The facility will emit organic compounds, combined HAPs, individual HAP, and particulate matter from the above-mentioned sources. The facility has a potential to emit of 653 TPY VOC, 19.1 TPY individual HAP, and 31.1 TPY combined HAP.

C. Operating Limitations

Baker McMillen has agreed to restrict their facility's emissions to 99.5 tons volatile organic compounds, 9.95 tons individual HAP, and 24.5 tons combined HAPs per rolling, 12-month period. The Permit to Install will contain terms and conditions to limit Baker McMillen to the above identified emission limitations.

D. Conclusions

The terms and conditions in the permit to install will limit the facility's VOC, individual HAP, and combined HAP emissions to less than Title V thresholds and allow to be classified as an area source. Baker McMillen shall maintain daily records of emissions and actual usage. Excursion reports will be required each emissions unit to ensure compliance.



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

SUMMIT COUNTY

Application No: 16-02448

Fac ID: 1677110035

CERTIFIED MAIL

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

DATE: 5/18/2006

Baker McMillen Company
Cheryl Rollence
3688 Wyoga Lake Road
Stow, OH 44224

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 **\$400** 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.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 16-02448

Application Number: 16-02448
Facility ID: 1677110035
Permit Fee: **To be entered upon final issuance**
Name of Facility: Baker McMillen Company
Person to Contact: Cheryl Rollence
Address: 3688 Wyoga Lake Road
Stow, OH 44224

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3688 Wyoga Lake Road
Stow, Ohio**

Description of proposed emissions unit(s):
Stain Machine.

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

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 cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	99.5
Ind. HAP	9.95
Total HAP	24.5

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>
P005 - Stain Machine #1 - application of stain to wooden parts	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-35-07 OAC rule 3745-31-05(C)	See Sections A.2.a - A.2.d below.
	OAC rule 3745-21-07(G)	See B.1 below.

2. Additional Terms and Conditions

- 2.a The combined annual coatings usage input rates* and combined annual emissions from the entire facility (P003 - P005, and R002 - R004, combined) shall not exceed the following as rolling, 12-month summations:

- i. 99.5 tons of VOC;
- ii. 24.5 tons of the combined hazardous air pollutants (HAPs); and
- iii. 9.95 tons of any individual HAP.

*The annual coatings usage (VOC) input rates are equivalent to the annual VOC emission rates, based upon 100% of the solvent in the coating materials being emitted.

- 2.b The potential emissions [as defined by OAC rule 3745-77-01(BB)] of HAPs as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall be less than 10 tons/yr for any single HAP and 25 tons/yr for any combination of HAPs, based upon rolling, 12-month summations.

Baker McMillen Company**PTI Application: 16-02448****Issued: To be entered upon final issuance****Facility ID: 1677110035****Emissions Unit ID: P005**

- 2.c** To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the maximum allowable cumulative coating usage input rates* and emissions levels specified in the following table:

Month	Maximum Allowable Cumulative Coating Usage Input Rates and Emissions of VOC (tons)*	Maximum Allowable Cumulative Emissions of Individual HAP (tons)	Maximum Allowable Cumulative Emissions Combined HAP (tons)
1	8.3	0.82	2.0
1-2	16.6	1.64	4.0
1-3	24.9	2.46	6.0
1-4	33.2	3.28	8.0
1-5	41.5	4.10	10.0
1-6	49.8	4.92	12.0
1-7	58.0	5.74	14.0
1-8	66.3	6.56	16.0
1-9	74.6	7.38	18.0
1-10	82.9	8.20	20.0
1-11	91.2	9.02	22.0
1-12	99.5	9.95	24.5

- 2.d** After the first 12 calendar months of operation following the issuance of this permit, compliance with the facility-wide coatings usage input rates limitation and VOC and HAP emission limitations shall be based upon a rolling, 12-month summation of the applicable coatings usage input rates and the HAP and VOC emission limitations, in tons.

B. Operational Restrictions

1. The permittee shall not employ any photochemically reactive material (coating or cleanup material), as defined by OAC rule 3745-21-01(C)(5), in this emissions unit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for each coating and cleanup material for emissions units P003 - P005, R002 - R004, combined:

Issued: To be entered upon final issuance

- a. the name and identification number of each coating and cleanup material, as applied;
- b. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material, as applied;
- c. the individual HAP content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;
- d. the total combined HAP content of each coating, in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (c)];
- e. the number of gallons of each coating employed;
- f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;
- g. the total combined HAP content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
- h. the number of gallons of each cleanup material employed;
- i. the total individual HAP emissions from all the coatings and cleanup materials employed, in pounds [for each HAP, the sum of (c) times (e) for all the coatings plus the sum of (f) times (h) for all the cleanup materials];
- j. the total combined HAPs emissions from all the coatings and cleanup materials employed, in pounds [the sum of (d) times (e) for all the coatings plus the sum of (g) times (h) for all the cleanup materials];
- k. the total VOC emissions from all the coatings and cleanup materials employed, in pounds [the sum of (b) times (e) for all the coatings plus the sum of (b) times (h) for all the cleanup materials];
- l. during the first 12 calendar months of operation following the issuance of this permit, the cumulative monthly VOC input rates, VOC emissions, total individual HAP, and total combined HAPs emissions, in tons, from all the coatings and cleanup materials;
- m. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month total VOC input rates and VOC emissions from all the coatings and cleanup materials employed, in tons;
- n. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month individual HAP emissions from all the coatings and cleanup materials employed, in tons; and

Issued: To be entered upon final issuance

- b. all exceedances of the rolling, 12-month VOC emission limitation of 99.5 tons;
 - c. all exceedances of the rolling, 12-month individual HAP emission limitation of 9.95 tons; and
 - d. all exceedances of the rolling, 12-month combined HAPs emission limitation of 24.5 tons
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the average hourly mass emission limitation for VOC of 0.18 pound, and the actual VOC emissions for each such period.
 4. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions of this permit.
 5. The permittee shall submit annual reports that specify the VOC, total HAPs, and individual HAP emissions, in tons, for emissions unit P003 - P005, R002 - R004, combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
 6. The permittee shall notify the Director (the Akron RAQMD) in writing of any monthly record showing the use of noncomplying coatings (i.e., photochemically reactive coatings) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

99.5 tpy VOC for (for emissions units P003 - P005, and R002 - R004, combined)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements established in section C.1 of these T&Cs.

b. Emission Limitation:

24.5 tpy of all HAPs (for emissions units P003 - P005, and R002 - R004, combined)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements established in section C.1 of these T&Cs.

c. Emission Limitation:

9.95 tpy of any individual HAP (for emissions units P003 - P005, and R002 - R004, combined)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements established in section C.1 of these T&Cs.

d. Emission Limitations

0.18 pounds/hour VOC (for this emissions unit)

0.79 tpy VOC (for this emissions unit)

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be demonstrated based upon the record keeping requirements established in section C.2 of these T&Cs.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

As long as compliance with the hourly limitation is maintained, compliance with the annual limitation shall be ensured (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000 lbs/ton).

2. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and

Baker McMillen Company

PTI Application: 16-02448

Issued: To be entered upon final issuance

Facility ID: 1677110035

Emissions Unit ID: P005

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 a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists’ (ACGIH’s) handbook entitled “TLVs and BEIs” (“Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices”), to increase to above 1.0 ton per year.

2. The following terms and conditions of this permit to install are federally enforceable: A - F.