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: FINAL PERMIT TO INSTALL
FRANKLIN COUNTY
Application No: 01-12026
Fac ID: 0125043113

DATE: 5/30/2006

CERTIFIED MAIL

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

Amtekco Industries Incorporated
Ron Fishking
1205 Refugee Road
Columbus, OH 43207-2114

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **CDO**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 5/30/2006**
Terms and Conditions	**Effective Date: 5/30/2006**

FINAL PERMIT TO INSTALL 01-12026

Application Number: 01-12026

Facility ID: 0125043113

Permit Fee: **$800**

Name of Facility: Amtekco Industries Incorporated

Person to Contact: Ron Fishking

Address: 1205 Refugee Road
Columbus, OH 43207-2114

Location of proposed air contaminant source(s) [emissions unit(s)]:
1205 Refugee Road
Columbus, **Ohio**

Description of proposed emissions unit(s):
Assembly and coating of restaurant furniture.

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

Joseph P. Koncelik

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

Pollutant	Tons Per Year
PE	14.0
OC	57.6
Single HAP	9.9
Combined HAPs	24.9

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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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
K001 - Metal Furniture Coating Application	OAC rule 3745-31-05(A)(3)	Volatile Organic compound (VOC) emissions from this emissions unit shall not exceed 15 lbs/day and 2.8 tons/year, including cleanup materials. Particulate emissions (PE) from the emissions unit stack shall not exceed 0.5 pounds per hour and 2.2 tons per year from coatings. See sections A.2.a below. The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-09(I)(3)(a), OAC rule 3745-17-07(A)(1) and OAC rule 3745-35-07(B).
	OAC rule 3745-21-09(I)(3)(a)	See section A.2.a below.
	OAC rule 3745-17-11(B)(1)	The requirements established pursuant to this rule are equivalent to the short term particulate emission limitation included in OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	See section A.2.b below.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V and federal MACT requirements)	See section A.2.d, B.1 and B.2 below.

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2. Additional Terms and Conditions

2.a Exempted from the requirements of OAC rule 3745-21-09(I)(1) are prime coat, topcoat, or single coat coating lines for metal furniture at a facility, only if all such lines, in combination, emit less than 15 pounds of VOC per day (before add-on controls).

2.b Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

2.c The hourly and annual PE limitations for this emissions unit were established to reflect the maximum potential to emit, as vented from the dry filtration system. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

2.d The individual and combined HAP[1] emissions from emissions units K001, R001 and R002 shall not exceed 9.9 tons and 24.9 tons, respectively, as a rolling, 12-month summation.

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.

B. Operational Restrictions

1. Each emissions unit will be operated and maintained in accordance with manufacturers recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

2. The permittee shall vent all emissions from coating operation to the dry filtration system, whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

2. The permittee shall collect and record the following information each day for all metal furniture coating lines at the facility:

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a. the name and identification number of each coating, as applied;

b. the mass of VOC per volume (excluding water and exempt solvents) and the volume of each coating (excluding water and exempt solvents), as applied; and

c. the total VOC emissions from the coatings employed, as calculated using the following equation:

$$T = A_1B_1 + A_2B_2 + ... + A_nB_n$$

where:

T = total VOC emissions from the combined coating lines before the application of capture systems and control devices, in units of pounds per day;

n = number of different coatings applied in the coating lines at the facility;

i = subscript denoting an individual coating;

A_i = mass of VOC per volume of coating (i) (excluding water and exempt solvents), as applied, in units of pounds VOC per gallon; and

B_i = volume of coating (i) (excluding water and exempt solvents), as applied, in units of gallons per day.

3. The permittee shall collect and record the following information for each month for this emissions unit:

a. The company identification of each cleanup material employed.

b. The number of gallons of each cleanup material employed.

c. The VOC content of each cleanup material employed, in pounds per gallon.

d. The total VOC emissions from all cleanup materials employed, in pounds [i.e., sum of (b) times (c) for each cleanup material employed].

e. The amount of cleanup material recovered, in pounds.

f. The total monthly VOC emissions from cleanup operations, in pounds [i.e., (d) - (e)].

4. The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, [i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year in section C.2 plus the sum of the monthly emissions from cleanup materials for the calendar year in section C.3].

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5. The permittee shall collect and record the following information for emissions units K001, R001, and R002 for each month:

   a. the name and identification number for each coating material employed;

   b. the individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating employed;

   c. the total combined HAP content of each HAP of each coating in pounds of combined HAPs per gallon of coating employed (sum of all the individual HAP contents from b);

   d. a summation of the number of gallons of each coating material employed during the month, plus the rolling,12-month summation of the total number of gallons of all coatings employed;

   e. the name and identification number for each clean up material employed;

   f. the individual HAP content for each HAP of each clean up material in pounds of individual HAP per gallon of clean up material employed;

   g. the total combined HAP content of each HAP of each clean up material in pounds of combined HAPs per gallon of clean up material employed (sum of all the individual HAP contents from f);

   h. a summation of the number of gallons of each clean up material employed during the month, plus the rolling, 12-month summation of the total number of gallons of all cleanup materials employed;

   i. the total individual HAP emissions for each HAP from all coatings and clean up materials employed, in pounds or tons month and pounds or tons per rolling 12 month period (for each HAP the sum of b time d for each coating and the sum of f times h for each clean up material); and

   j. the total combined HAP emissions for each HAP from all coatings and clean up materials employed, in pounds or tons month and pounds or tons per rolling 12 month period (for each HAP the sum of c time d for each coating and the sum of g times h for each clean up material)

   [1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

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6. The permit to install for these emissions units in this permit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum
Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant: toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 2.8
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 77.5
MAGLC (ug/m3): 4,476

Pollutant: xylene
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 3.5
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 99.1
MAGLC (ug/m3): 10,309

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the “Air Toxic Policy” is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the “Air Toxic Policy” will still be satisfied. If, upon evaluation, the permittee determines that the “Air Toxic Policy” will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the “Air Toxic Policy” include the following:

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 previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitations of 9.9 tons of individual HAP and 24.9 tons of combined HAP emissions. These reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions, Section A of this permit.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any daily record showing that the combined VOC emissions (excluding emissions from cleanup materials) from all of the metal furniture coating lines at the facility are equal to or greater than 15 pounds of VOC per day (before add-on controls). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 45 days after the exceedance occurs.

3. The permittee shall notify the Central District Office in writing of any record showing that the dry filtration system was not in service when this emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office) within 30 days after the event occurs.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

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a. Emissions Limitation:
VOC emissions shall not exceed 15 lbs/day.

Applicable Compliance Method:
Compliance shall based upon the record keeping specified in Section C.2.c.

b. Emissions Limitation:
VOC emissions shall not exceed 2.8 tons per year, including cleanup solvent usage.

Applicable Compliance Method:
Compliance shall based upon the record keeping specified in Section C.4.

c. Emission Limitation:
The individual and combined HAP[1] emissions from emissions units K001, R001 and R002 shall not exceed 9.9 tons and 24.9 tons, respectively, as a rolling, 12-month summation.

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above limit based upon a rolling,12-month summation of the record keeping requirements in section C.5, above.

d. Emission Limitation:
PE from spray room stack shall not exceed 0.5 lb PE/hour.

Applicable Compliance Method:
To determine the worst case PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pound per hour, x (1-TE) x (1-CE)

where E = PE rate (lb/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

e. Emission Limitation:
PE from the spray booth stack shall not exceed 2.2 tons per year.

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Applicable Compliance Method:
Compliance with the lb/hour emission limitation demonstrates compliance with this limitation because this limitation is based on the lb/hour limitation assuming the source operated 8,760 hours per year and the dry filtration system was in operation.

f. Emission Limitation:
Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:
When requested by the Ohio EPA, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

F. Miscellaneous Requirements

None

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PART III - 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P001 - Woodworking Operations with Dust Collector	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) from the bag house stack shall not exceed 2.2 pounds per hour and 9.6 tons per year. See sections A.2.a below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-35-07(B).
	OAC rule 3745-17-07(A)(1)	See section A.2.c below.
	OAC rule 3745-17-11(B)(1)	The PE limitation established pursuant to OAC rule 3745-31-05 above is more stringent than the emission limitation established by this rule.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V)	See sections A.2.b, B.1, and C.1 below.

2. Additional Terms and Conditions

2.a The 2.2 lbs PE/hour and 9.6 tons PE/year limitations for this emissions unit were established to reflect the maximum potential to emit as vented through a bag house. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limitations.

2.b The permittee shall operate and maintain the sawdust collection system and vent emissions to the baghouse according to manufactures specifications to maximize capture efficiency and control capabilities.

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2.c Visible PE from the bag house stack shall not exceed 20%, as a 6- minute average, except as provided by rule.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 0.5 to 4.0 inches of water while the emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emission unit is in operation. The monitoring equipment shall be installed, calibrated, operates and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual. The permittee shall record the pressure drop across the bag house on a daily basis.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all time periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above. The notification shall include a copy of such record and shall be sent to the Director (appropriate District Office) within 30 days after the event occurs.

E. Testing Requirements

1 Compliance with the emission limitations in sections A.1. and A.2 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
PE from the baghouse stack shall not exceed 2.2 lbs/hour.

Applicable Compliance Method:
The hourly PE emission rate may be determined by calculation at an air flow rate of 12,700 actual cubic foot per minute (acfm) multiplied by an outlet loading of 0.02 grains/dry standard cubic foot (dscf) multiplied by 1 lb/7,000 grains multiplied by 60 minutes/1hour equals 2.2 lbs/hour.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(10).

b. Emission Limitation:
PE shall not exceed 9.6 tons per year.

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Applicable Compliance Method:
The annual limitation was established by multiplying the hourly emission limitation by the maximum possible annual operating hours (8,760 hrs/yr) and dividing by 2000 lbs/ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the hourly emission limitation.

c. Emission Limitation:
Visible PE from the baghouse stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be demonstrated through visible emissions observation performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None

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PART III - 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R001 - Wood Furniture Adhesive Coating Application	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions from this emissions unit shall not exceed 7.7 lbs/hour and 33.73 tons/year, including cleanup materials. The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-07(G)(9)(d) and OAC rule 3745-35-07(B). See sections A.2.a .
	OAC rule 3745-21-07(G)(9)(d) OAC rule 3745-17-11(B)(1) OAC rule 3745-17-07(A)(1)	The requirements established pursuant to these rules are not applicable because the process does not release particulate emissions (PE) into the ambient air. See section A.2.b below.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V and federal MACT requirements)	

2. **Additional Terms and Conditions**

2.a The volatile content of the liquid organic material does not exceed 20% by volume of said material and the volatile content is not a "photochemically reactive material".

2.b The individual and combined HAP[1] emissions from emissions units K001, R001 and R002 shall not exceed 9.9 tons and 24.9 tons, respectively, as a rolling, 12-month summation.

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2.c The permittee has existing HAP emissions records such that the usage does not need to be restricted on a monthly basis during the first year after the permit is issued final.

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:

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

   b. the number of gallons of each coating and cleanup material employed;

   c. the organic compound content of each coating and cleanup material, in pounds per gallon;

   d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;

   e. the total number of hours the emissions unit was in operation; and

   f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d / e), in pounds per hour (average).

   [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating and cleanup materials for the calendar year in section C.1].

3. The permittee shall collect and record the following information for emissions units K001, R001, and R002 for each month:

   a. the name and identification number for each coating material employed;

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b. the individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating employed;

c. the total combined HAP content of each HAP of each coating in pounds of combined HAPs per gallon of coating employed (sum of all the individual HAP contents from b);

d. a summation of the number of gallons of each coating material employed during the month, plus the rolling, 12-month summation of the total number of gallons of all coatings employed;

e. the name and identification number for each clean up material employed;

f. the individual HAP content for each HAP of each clean up material in pounds of individual HAP per gallon of clean up material employed;

g. the total combined HAP content of each HAP of each clean up material in pounds of combined HAPs per gallon of clean up material employed (sum of all the individual HAP contents from f);

h. a summation of the number of gallons of each cleanup material employed during the month, plus the rolling, 12-month summation of the total number of gallons of all cleanup materials employed;

i. the total individual HAP emissions for each HAP from all coatings and clean up materials employed, in pounds or tons month and pounds or tons per rolling 12 month period (for each HAP the sum of b time d for each coating and the sum of f times h for each clean up material); and

j. the total combined HAP emissions for each HAP from all coatings and clean up materials employed, in pounds or tons month and pounds or tons per rolling 12 month period (for each HAP the sum of c time d for each coating and the sum of g times h for each clean up material).

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

4. The permit to install for this emissions unit in this permit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved

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model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum
Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.8
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 23.2
MAGLC (ug/m3): 4,476

Pollutant: hexane
TLV (mg/m3): 176
Maximum Hourly Emission Rate (lbs/hr): 0.8
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 23.2
MAGLC (ug/m3): 4,190

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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 previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify each hour during which the OC emissions from the coatings and cleanup materials exceeded 7.7 pounds per hour, and the actual OC emissions for each such hour.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitation of 9.9 tons individual HAP and 24.9 tons combined HAP emissions limitation.

3. These deviation (excursion) reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions, Section A of this permit.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. and A.2 of these terms and conditions shall be determined in accordance with the following method(s):

a. Emissions Limitation:
OC emissions shall not exceed 7.7 lbs/hour.

Applicable Compliance Method:
Compliance shall based upon the record keeping specified in section C.1.f.

b. Emission Limitation:
OC emissions shall not exceed 33.73 tons per year.

Applicable Compliance Method:
The annual limitation was established by multiplying the hourly emission limitation by the maximum possible annual operating hours (8,760 hrs/yr) and dividing by 2000 lbs/ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the hourly emission limitation.

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c. Emission Limitation:
The individual and combined HAP[1] emissions from emissions units K001, R001 and R002 shall not exceed 9.9 tons and 24.9 tons, respectively, as a rolling, 12-month summation.

Applicable Compliance Method:
The permittee shall demonstrate compliance with the above limit based upon the rolling,12-month summation of record keeping requirements in section C.3, above.

F. Miscellaneous Requirements

None

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PART III - 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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R002 - Wood Furniture Coating Room	OAC rule 3745-31-05(A)(3)	Organic compound (OC) emissions from this emissions unit shall not exceed 4.8 lbs/hour and 21.02 tons per year, including cleanup materials. Particulate emissions (PE) shall not exceed 0.5 pounds per hour and 2.2 tons per year from coatings. The requirements established pursuant to this rule also include the requirements of OAC rule 3745-21-07(G)(2), OAC rule 3745-17-07(A)(1) and OAC rule 3745-35-07(B).
	OAC rule 3745-21-07(G)(2)	See section A.2.a below.
	OAC rule 3745-17-11(B)(1)	The requirements established pursuant to this rule are equivalent to the short term particulate emission limitation included in OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)(1)	See section A.2.b below.
	OAC rule 3745-35-07(B) (synthetic minor to avoid Title V and federal MACT requirements)	See section A.2.d, B.1 and B.2 below.

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2. Additional Terms and Conditions

2.a To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

2.b Visible PE from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.

2.c The hourly and annual PE limitations for this emissions unit were established to reflect the maximum potential to emit, as vented from the dry filtration system. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

2.d The individual and combined HAP[1] emissions from emissions units K001, R001 and R002 shall not exceed 9.9 tons and 24.9 tons, respectively, as a rolling, 12-month summation.

The permittee has existing HAP emissions records such that the usage does not need to be restricted on a monthly basis during the first year after the permit is issued final.

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the adhesive/coatings and clean up materials. This information does not have to be kept on a line-by-line basis.

B. Operational Restrictions

1. Each emissions unit will be operated and maintained in accordance with manufacturers recommendations. Spray booth exhaust filters shall be maintained (changed or cleaned) regularly per manufacturer's recommendations in order to maintain the highest effective level of particulate emissions control. Maintenance of exhaust filters (cleaning and/or changing of filter elements) shall be recorded in an operations log maintained at this facility.

2. The permittee shall vent all emissions from coating operation to the dry filtration system, whenever this emissions unit is in operation.

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C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:

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

   b. the number of gallons of each coating and cleanup material employed;

   c. the organic compound content of each coating and cleanup material, in pounds per gallon;

   d. the total organic compound emission rate for all coatings and cleanup materials, in pounds per day;

   e. the total number of hours the emissions unit was in operation; and

   f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (d / e), in pounds per hour (average).

   [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall calculate and record the total annual OC emissions from coatings and cleanup materials, [i.e., the sum of the daily OC emission rates from the coating and cleanup materials for the calendar year in section C.1].

3. The permittee shall collect and record the following information for emissions units K001, R001, and R002 for each month:

   a. the name and identification number for each coating material employed;

   b. the individual HAP content for each HAP of each coating in pounds of individual HAP per gallon of coating employed;

   c. the total combined HAP content of each HAP of each coating in pounds of combined HAPs per gallon of coating employed (sum of all the individual HAP contents from b);

   d. a summation of the number of gallons of each coating material employed during the month, plus the rolling, 12-month summation of the total number of gallons of all coatings employed;

   e. the name and identification number for each clean up material employed;

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f. the individual HAP content for each HAP of each clean up material in pounds of individual HAP per gallon of clean up material employed;

g. the total combined HAP content of each HAP of each clean up material in pounds of combined HAPs per gallon of clean up material employed (sum of all the individual HAP contents from f);

h. a summation of the number of gallons of each clean up material employed during the month, plus the rolling, 12-month summation of the total number of gallons of all cleanup materials employed;

i. the total individual HAP emissions for each HAP from all coatings and clean up materials employed, in pounds or tons month and pounds or tons per rolling 12 month period (for each HAP the sum of b time d for each coating and the sum of f times h for each clean up material); and

j. the total combined HAP emissions for each HAP from all coatings and clean up materials employed, in pounds or tons month and pounds or tons per rolling 12 month period (for each HAP the sum of c time d for each coating and the sum of g times h for each clean up material).

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.

4. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

5. The permit to install for this emissions unit in this permit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum
Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant: toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.4
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 11.2
MAGLC (ug/m3): 4,476

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Pollutant: naptha
TLV (mg/m3): 434
Maximum Hourly Emission Rate (lbs/hr): 1.86
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 52.1
MAGLC (ug/m3): 10,333

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

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 previously modeled;

b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. Where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify each hour during which the OC emissions from the coatings and cleanup materials exceeded 4.8 pounds per hour, and the actual OC emissions for each such hour.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month limitations of 9.9 tons of individual HAP and 24.9 tons of combined HAP emissions.

3. These reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions, Section A of this permit.

4. The permittee shall notify CDO in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Central District Office within 30 days after the event occurs.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1. and A.2 of these terms and conditions shall be determined in accordance with the following method(s):

   a. Emissions Limitation:
   OC emissions shall not exceed 4.8 lbs/hour.

   Applicable Compliance Method:
   Compliance shall based upon the record keeping specified in section C.1.f.

   b. Emission Limitation:
   OC emissions shall not exceed 21.02 tons per year.

   Applicable Compliance Method:
   The annual limitation was established by multiplying the hourly emission limitation by the maximum possible annual operating hours (8,760 hrs/yr) and dividing by 2000 lbs/ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the hourly emission limitation.

   c. Emission Limitation:
   The individual and combined HAP[1] emissions from emissions units K001, R001 and R002 shall not exceed 9.9 tons and 24.9 tons, respectively, as a rolling, 12-month summation.

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Applicable Compliance Method:
The permittee shall demonstrate compliance with the above limit based upon the rolling,12-month summation of record keeping requirements in section C.3, above.

d. Emission Limitation:
PE from spray room stack shall not exceed 0.5 lb PE/ hour

Applicable Compliance Method:
To determine the worst case PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pound per hour, x (1-TE) x (1-CE)

where E = PE rate (lb/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.55); and

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

e. Emission Limitation:
PE from the spray booth stack shall not exceed 2.2 ton/year

Applicable Compliance Method:
Compliance with the lb/hr emission limitation demonstrates compliance with this limitation because this limitation is based on the lb/hour limitatiion assuming the source operated 8760 hours per year.

f. Emission Limitation:
Visible PE from any stack serving this emissions unit shall not exceed 20 % opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:
When requested by the Ohio EPA, compliance with the above visible emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

F. Miscellaneous Requirements

None

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