

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **02-14513**

Precision Door & Glass Inc

A. Source Description

This PTI is for the installation of five (5) new spray booths (R006 - R010) and for three (3) existing spray booths (R003 - R005). The booths finish both metal and fiberglass exterior entry way doors for homes. R003 and R008 are equipped with robotic, HVLP electrostatic guns for the application of topcoat and sealer, and followed by flash-off ovens set at 160 degrees F. R006 is equipped with robotic, HVLP electrostatic guns for the application of water based primer and followed by an IR oven set at 160 degrees F. R004 and R007 are equipped with manual HVLP guns for the application of topcoat and sealer and followed by a flash-off oven set at 160 degrees F. R005, R009 and R010 are equipped with manual guns for the application of stains and the doors are hand wiped and followed by IR ovens set at 160 degrees F. Doors follow an overhead track system through the plant.

B. Facility Emissions and Attainment Status

The facility is located in Holmes County, which is attainment for all criteria pollutants. The facility is a major source according to Title V for VOC, with the PTE of 164.9 tons per year. Potential HAP emissions were evaluated and are less than 1 ton per year. Actual emissions of VOC were 24.6 tons in 2000.

C. Source Emissions

The facility has requested a Synthetic Minor PTI that includes all eight emissions units. Each emissions unit is limited separately with a tons of VOC per rolling, 12-month period. Clean-up material is included in the tons of VOC per rolling, 12-month period. All emissions units have a operational limit in gallons of coating applied, in gallons per rolling, 12-month period.

Emissions unit	VOC limit, tons per 12-month	Operational limit and BAT VOC content
R003	10.0	5142 gal/12-month, 3.5 lbs VOC/gal
R004	10.0	5142 gal/12-month, 3.5 lbs VOC/gal
R005	8.0	2847 gal/12-month, 5.3 lbs VOC/gal
R006	6.0	5217 gal/12-month, 2.3 lbs VOC/gal
R007	12.0	6286 gal/12-month, 3.5 lbs VOC/gal
R008	18.0	9714 gal/12-month, 3.5 lbs VOC/gal

R009	8.0	2847 gal/12-month, 5.3 lbs VOC/gal
R010	7.0	2445 gal/12-month, 5.3 lbs VOC/gal
total	79 tons per 12-month period	

The terms and conditions also include daily record keeping of the coating usage and a monthly summation of the coating used and the VOC emissions during the previous 12-month period. The permittee is required to submit quarterly deviation reports identifying any month that the coating usage or emissions limit was exceeded and to submit an annual report of the coating usage and calculated VOC emissions.

D. Conclusion

The emission limits contained in these synthetic minors PTIs are adequate to provide federally enforceable limitations for ensuring that the applicable Title V thresholds will not be exceeded.



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
HOLMES COUNTY
Application No: 02-14513**

DATE: 2/27/2001

Precision Door & Glass Inc
Scott Tritt
2150 State Route 39
Sugarcreek, OH 44681-9201

CERTIFIED MAIL

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

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 **\$1300** 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

NEDO



Permit To Install

Issue Date: To be entered upon final issuance

Terms and Conditions

Effective Date: To be entered upon final issuance

DRAFT PERMIT TO INSTALL 02-14513

Application Number: 02-14513

APS Premise Number: 0238000159

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

Name of Facility: Precision Door & Glass Inc

Person to Contact: Scott Tritt

Address: 2150 State Route 39
Sugar creek, OH 44681-9201

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

**2150 State Route 39
Sugar creek, Ohio**

Description of proposed emissions unit(s):

4 coating booths for door manufacturing.

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 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 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

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 source(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	79.0

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>
R003 - automated Binks HVLP electrostatic spray operation for the coating of steel and fiberglass doors, followed by a flash-off oven.	OAC Rule 3745-31-05(A)(3)	See 2.a and 2.b below. The requirements of this rule also include compliance with the requirements of OAC Rule 3745-21-09(U).
	OAC Rule 3745-21-07(G)	See 2.c below.
	OAC Rule 3745-21-09(U)	See 2.d below.
	OAC Rule 3745-35-07(B)	See 2.b below.

2. Additional Terms and Conditions

- 2.a The VOC emissions from coatings and clean up materials shall not exceed 6.7 pounds per hour. The short term emission limitation for VOC established in A.1 above was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b The VOC emissions from all coatings and cleanup materials shall not exceed 10.0 tons per rolling, 12-month period.
- 2.c The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA, Northeast District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum,

shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

- 2.d** The VOC content of the coatings employed shall not exceed a volume-weighted average of 3.5 lbs per gallon, as applied excluding water and exempt solvents.

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
2. The annual coating usage in this emissions unit shall not exceed 5142 gallons per rolling, 12-month period, as applied excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) of each coating, as applied.
 - c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - d. The daily VOC emission from all coatings combined, in pounds or tons, (the sum of b times c for each coating.)
 - e. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
3. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month VOC emissions:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material, in pounds per gallon.
 - d. The total VOC emissions from all cleanup materials, in pounds or tons.

- e. The total VOC emissions from all coatings, in pounds or tons, (the sum of the daily VOC emissions recorded according to C.2.d.)
 - f. The total VOC emissions from all coatings and clean-up materials, in pounds or tons, (sum of d plus e).
 - g. The rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period.
4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month coating usage:
- a. The number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.2.b.)
 - b. The rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
5. The permittee shall retain all records according the General Terms and Conditions.
6. The permit to install for this emissions unit R003 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: Methyl n-amyl ketone

TLV (mg/m3): 184.3

Maximum Hourly Emission Rate (lbs/hr): 3.69

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 870

Predicted 1-Hour Maximum Ground-Level Concentration, sum of R003, R004, R007 and R008, combined (ug/m3): 2274

MAGLC (ug/m3): 4388

7. 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 still 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.).
8. 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.
9. 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 notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were 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 Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

2. The permittee shall submit quarterly reports which include the following information from this emission unit:
 - a. An identification of each day during which the VOC content of the daily volume-weighted average of coatings employed exceeded 3.5 pounds per gallon and the actual VOC content of each such coatings employed.
 - b. The VOC emissions from all coatings and clean up materials, pounds or tons.
 - c. The coating usage, in gallons as applied excluding water and exempt solvents.

The quarterly deviations reports shall be submitted in accordance with the General Terms and Conditions.

3. The permittee shall also submit annual reports which summarize the following information:
 - a. the total emissions of VOC from this emission unit; and
 - b. the total coating usage of this emissions unit.

The reports shall include the emissions calculations, shall be submitted by January 31 of each year, and shall cover the previous calendar year.

E. Testing Requirements

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

- a. Emission Limitation:
3.5 lbs/gal volume-weighted average VOC content of all coatings, as applied.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.2.e calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

- b. Emission Limitation:
6.7 lbs of VOC per hour

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum coating usage rate times the permit allowable VOC content per gallon of coating, as applied, according to the following equation:

$$\text{Ehr} = (1.92 \text{ gal/hr}) * (3.5 \text{ lbs VOC/gal})$$

- c. Emissions Limitation:

Precision Door & Glass Inc
PTI Application: 02-14513
Issued: To be entered upon final issuance

Facility ID: 0238000159
Emissions Unit ID: R003

10.0 tons of OC emissions per rolling, 12-month period from all coatings and cleanup materials.

Applicable Compliance Method:
Compliance shall be determined by the value recorded in C.3.g.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

1. The terms and conditions of this permit replace in whole the requirements of PTI 02-08664, issued December 14, 1994.
2. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F; except C.6, C.7, C.8 and C.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>
R004 - Binks HVLP manual spray operation for the coating of steel and fiberglass doors, followed by flash-off oven	OAC Rule 3745-31-05(A)(3)	See 2.a and 2.b below. The requirements of this rule also include compliance with the requirements of OAC Rule 3745-21-09(U).
	OAC Rule 3745-21-07(G)	See 2.c below.
	OAC Rule 3745-21-09(U)	See 2.d below.
	OAC Rule 3745-35-07(B)	See 2.b below.

2. Additional Terms and Conditions

- 2.a The VOC emissions from coatings and clean up materials shall not exceed 4.4 pounds per hour. The short term emission limitation for VOC established in A.1 above was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b The VOC emissions from all coatings and cleanup materials shall not exceed 10.0 tons per rolling, 12-month period.
- 2.c The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA, Northeast District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or

control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

- 2.d** The VOC content of the coatings employed shall not exceed a volume-weighted average of 3.5 lbs per gallon, as applied excluding water and exempt solvents.

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
2. The annual coating usage in this emissions unit shall not exceed 5142 gallons per rolling, 12-month period, as applied excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) of each coating, as applied.
 - c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - d. The daily VOC emission from all coatings combined, in pounds or tons, (the sum of b times c for each coating.)
 - e. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
3. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month VOC emissions:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material, in pounds per gallon.
 - d. The total VOC emissions from all cleanup materials, in pounds or tons.
 - e. The total VOC emissions from all coatings, in pounds or tons, (the sum of the daily VOC

emissions recorded according to C.2.d.)

- f. The total VOC emissions from all coatings and clean-up materials, in pounds or tons, (sum of d plus e).
 - g. The rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period.
4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month coating usage:
- a. The number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.2.b.)
 - b. The rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
5. The permittee shall retain all records according to A.3. of the General Terms and Conditions.
6. The permit to install for this emissions unit R004 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: Methyl n-amyl ketone

TLV (mg/m³): 184.3

Maximum Hourly Emission Rate (lbs/hr): 2.42

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1124

Predicted 1-Hour Maximum Ground-Level Concentration, sum of R003, R004, R007 and R008, combined (ug/m³): 2274

MAGLC (ug/m³): 4388

7. 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 still

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.).
8. 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.
9. 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 notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were 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 Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

2. The permittee shall submit quarterly reports which include the following information from this emission unit:
 - a. An identification of each day during which the VOC content of the daily volume-weighted average of coatings employed exceeded 3.5 pounds per gallon and the actual VOC content of each such coatings employed.
 - b. The VOC emissions from all coatings and clean up materials, pounds or tons.
 - c. The coating usage, in gallons as applied excluding water and exempt solvents.

The quarterly reports shall be submitted in accordance with the General Terms and Conditions.

3. The permittee shall also submit annual reports which summarize the following information:
 - a. the total emissions of VOC from this emission unit; and
 - b. the total coating usage of this emissions unit.

The reports shall include the emissions calculations, shall be submitted by January 31 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
3.5 lbs/gal volume-weighted average VOC content of all coatings, as applied.

Applicable Compliance Method:
Compliance shall be determined by the value recorded in C.2.e calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
 - b. Emission Limitation:
4.4 lbs of VOC per hour

Applicable Compliance Method:
Compliance shall be determined by multiplying the maximum coating usage rate times the permit allowable VOC content per gallon of coating, as applied, according to the following equation:

$$E_{hr} = (1.26 \text{ gal/hr}) * (3.5 \text{ lbs VOC/gal})$$
 - c. Emissions Limitation:

Precision Door & Glass Inc
PTI Application: 02-14513
Issued: To be entered upon final issuance

Facility ID: 0238000159
Emissions Unit ID: R004

10.0 tons of VOC emissions per rolling, 12-month period from all coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.3.g.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

1. The terms and conditions of this permit replace in whole the requirements of PTI 02-08664, issued December 14, 1994.
2. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F, except C.6, C.7, C.8 and C.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>
R005 - manual application using HVLP Binks spray gun of stain. Manual brushing of doors also conducted, followed by IR oven.	OAC Rule 3745-31-05(A)(3)	See 2.a, 2.b, 2.d and 2.e below.
	OAC Rule 3745-21-07(G)	See 2.c below.
	OAC Rule 3745-21-09(U)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC Rule 3745-35-07(B)	See 2.b, 2.d and 2.e below.

2. Additional Terms and Conditions

- 2.a The VOC emissions from coatings and clean up materials shall not exceed 1.7 pounds per hour.
- 2.b The VOC emissions from all coatings and cleanup materials shall not exceed 8.0 tons per rolling, 12-month period.
- 2.c The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA, Northeast District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

2.d The VOC content of the coatings employed shall not exceed 5.3 lbs per gallon, as applied excluding water and exempt solvents.

2.e The permittee shall employ no more than 7.8 gallons of coating per day, as applied.

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
2. The annual coating usage in this emissions unit shall not exceed 2847 gallons per rolling, 12-month period, as applied excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) of each coating, as applied.
 - c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - d. The daily VOC emission from all coatings combined, in pounds or tons, (the sum of b times c for each coating.)
 - e. The actual operating hours of this emissions unit.
 - f. The average hourly VOC emissions rate, (d divided by e).
3. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month VOC emissions:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material, in pounds per gallon.
 - d. The total VOC emissions from all cleanup materials, in pounds or tons.

- e. The total VOC emissions from all coatings, in pounds or tons, (the sum of the daily VOC emissions recorded according to C.2.d.)
 - f. The total VOC emissions from all coatings and clean-up materials, in pounds or tons, (sum of d plus e).
 - g. The rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period.
4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month coating usage:
 - a. The number of number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.2.b.)
 - b. The rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
 5. The permittee shall retain all records according to A.3. of the General Terms and Conditions.
 6. The permit to install for this emissions unit R005 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: Mineral spirits

TLV (mg/m3): 572.6

Maximum Hourly Emission Rate (lbs/hr): 7.83

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1503

Predicted 1-Hour Maximum Ground-Level Concentration sum of K005, K009 and K010 (ug/m3): 2231

MAGLC (ug/m3): 13,633

7. 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.).
8. 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.
9. 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 notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were 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 Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

2. The permittee shall submit quarterly reports which include the following information from this emission unit:
 - a. An identification of each day during which the VOC content of any coating exceeded 5.3 pounds per gallon and the actual VOC content of each such coating employed.
 - b. An identification of each day during which the average hourly VOC emissions rate exceeded 1.7 pounds and the actual emissions rate of each such day.
 - c. The VOC emissions from all coatings and clean up materials, in pounds or tons.
 - d. The total gallons of coating employed.

The quarterly reports shall be submitted in accordance with the General Terms and Conditions.

3. The permittee shall also submit annual reports which summarize the following information:
 - a. The total emissions of VOC from this emission unit.
 - b. The total coating usage of this emissions unit.

The reports shall include the emissions calculations, shall be submitted by January 31 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
5.3 lbs of VOC per gallon of coating, as applied.

Applicable Compliance Method:
Compliance shall be determined by the value recorded in C.2.e calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
 - b. Emissions Limitation:
1.7 lbs VOC per hour

Applicable Compliance Method:
Compliance shall be determined base upon the value recorded in C.2.f.
 - c. Emissions Limitation:
7.8 gallons of coating per day

Applicable Compliance Method:

Precision Door & Glass Inc
PTI Application: 02-14513
Issued: To be entered upon final issuance

Facility ID: 0238000159
Emissions Unit ID: R005

Compliance shall be determined base upon the sum of the values recorded in C.2.c.

- d. Emissions Limitation:
8.0 tons of VOC emissions per rolling, 12-month period from all coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be determined base upon the value recorded in C.3.g.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

1. The terms and conditions of this permit replace in whole the requirements of PTI 02-08664, issued December 14, 1994.
2. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F, except C.6, C.7, C.8 and C.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>
R006 - Protect aire 15x15x10 spray booth for the application of primer to metal doors, followed by an IR oven.	OAC Rule 3745-31-05(A)(3)	See 2.a, 2.b and 2.d below.
	OAC Rule 3745-21-07(G)	See A.2.c below.
	OAC Rule 3745-21-09(U)	The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC Rule 3745-31-05(A)(3).
	OAC Rule 3745-35-07(B)	See 2.b below.

2. Additional Terms and Conditions

- 2.a The VOC emissions from coatings and clean up materials shall not exceed 4.4 pounds per hour. The short term emission limitation for VOC established in A.1 above was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b The VOC emissions from all coatings shall not exceed 6.0 tons per rolling, 12-month period.
- 2.c The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA, Northeast District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

- 2.d** The VOC content of the coatings employed shall not exceed 2.3 lbs per gallon, as applied excluding water and exempt solvents.

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
2. The annual coating usage in this emissions unit shall not exceed 5217 gallons per rolling, 12-month period, as applied excluding water and exempt solvents.
3. The permittee shall employ only water or acetone as clean-up materials.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) of each coating, as applied.
 - c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - d. The daily VOC emission from all coatings combined, in pounds or tons, (the sum of b times c for each coating.)
 - e. The actual operating hours of this emissions unit.
 - f. The average hourly VOC emissions rate, (d divided by e).
3. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month VOC emissions:
 - a. The total volume of all coatings employed , in gallons (the sum of the coating usage for all coatings recorded in C.2.c).
 - b. The total VOC emissions from all coatings, in pounds or tons, (the sum of the daily VOC emissions recorded according to C.1.d).
 - c. The rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period.

4. The permittee shall collect and record the following information monthly for the purpose of

determining the rolling, 12-month coating usage:

- a. The number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.2.c)
 - b. The rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
5. The permittee shall maintain daily records that document all time periods when clean-up material other than acetone or water is employed in this emissions unit.
 6. The permittee shall retain all records according to the General Terms and Conditions.

D. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that:
 - a. The dry filters were not in service when the emissions unit was in operation.
 - b. Clean-up material other than water or acetone was employed in this emissions unit.

The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

2. The permittee shall submit quarterly reports which include the following information from this emission unit:
 - a. An identification of each day during which the VOC content of the daily volume-weighted average of coatings employed exceeded 2.3 pounds per gallon and the actual VOC content of each such coatings employed.
 - b. The total VOC emission, pounds or tons.
 - c. The total gallons of coating employed, in gallons as applied (excluding water and exempt solvents).

The quarterly reports shall be submitted in accordance with the General Terms and Conditions.

3. The permittee shall also submit annual reports which summarize the following information:
 - a. The total emissions of VOC from this emission unit.
 - b. The total coating usage of this emissions unit.

The reports shall include the emissions calculations, shall be submitted by January 31 of each year,

and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
2.3 lbs of VOC per gallons of coating, as applied.

Applicable Compliance Method:
Compliance shall be determined by the value recorded in C.2.b.
 - b. Emission Limitation:
4.4 lbs of VOC per hour

Applicable Compliance Method:
Compliance shall be determined by the value recorded in C.2.f.
 - c. Emissions Limitation:
6.0 tons of OC emissions per rolling, 12-month period from all coatings and cleanup materials.

Applicable Compliance Method:
Compliance shall be determined by the value recorded in C.3.c.
2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings employed in the emissions unit.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-E.
2. 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 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 cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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>
R007 - Protect aire 10x13x10 manual spray booth for the application of paint to steel, fiberglass or plastic doors and trim, followed by a flash-off oven.	OAC Rule 3745-31-05(A)(3)	See 2.a and 2.b below. The requirements of this rule also include compliance with the requirements of OAC Rule 3745-21-09(U).
	OAC Rule 3745-21-07(G)	See 2.c below.
	OAC Rule 3745-21-09(U)	See 2.d below.
	OAC Rule 3745-35-07(B)	See 2.b below.

2. Additional Terms and Conditions

- 2.a The VOC emissions from coatings and clean up materials shall not exceed 4.4 pounds per hour. The short term emission limitation for VOC established in A.1 above was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b The VOC emissions from all coatings and cleanup materials shall not exceed 12.0 tons per rolling, 12-month period.
- 2.c The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA, Northeast District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or

control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

- 2.d** The VOC content of the coatings employed shall not exceed a volume-weighted average of 3.5 lbs per gallon, as applied excluding water and exempt solvents.

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
2. The annual coating usage in this emissions unit shall not exceed 6286 gallons per rolling, 12-month period, as applied (excluding water and exempt solvents).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) of each coating, as applied.
 - c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - d. The daily VOC emission from all coatings combined, in pounds or tons, (the sum of b times c for each coating.)
 - e. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
3. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month VOC emissions:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material, in pounds per gallon.
 - d. The total VOC emissions from all cleanup materials, in pounds or tons.
 - e. The total VOC emissions from all coatings, in pounds or tons, (the sum of the daily VOC

emissions recorded according to C.2.d.)

- f. The total VOC emissions from all coatings and clean-up materials, in pounds or tons, (sum of d plus e).
 - g. The rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period.
4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month coating usage:
 - a. The number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.2.b.)
 - b. The rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
 5. The permittee shall retain all records according to A.3. of the General Terms and Conditions.
 6. The permit to install for this emissions unit R007 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: Methyl n-amyl ketone

TLV (mg/m³): 184.3

Maximum Hourly Emission Rate (lbs/hr): 2.42

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 170

Predicted 1-Hour Maximum Ground-Level Concentration, sum of R003, R004, R007 and R008, combined (ug/m³): 2274

MAGLC (ug/m³): 4388

7. 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 still

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.).
8. 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.
9. 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 notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were 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 Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

2. The permittee shall submit quarterly reports which include the following information from this emission unit:
 - a. An identification of each day during which the VOC content of the daily volume-weighted average of coatings employed exceeded 3.5 pounds per gallon and the actual VOC content of each such coatings employed.
 - b. The total VOC emissions from all coatings and cleanup materials, pounds or tons.
 - c. The total coating usage, in gallons as applied (excluding water and exempt solvents).

The quarterly reports shall be submitted in accordance with the General Terms and Conditions.

3. The permittee shall also submit annual reports which summarize the following information:
 - a. the total emissions of VOC from this emission unit; and
 - b. the total coating usage of this emissions unit.

The reports shall include the emissions calculations, shall be submitted by January 31 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
3.5 lbs/gal volume-weighted average VOC content of all coatings, as applied.

Applicable Compliance Method:
Compliance shall be determined by the value recorded in C.2.e calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
 - b. Emission Limitation:
4.4 lbs of VOC per hour

Applicable Compliance Method:
Compliance shall be determined by multiplying the maximum coating usage rate times the permit allowable VOC content per gallon of coating, as applied, according to the following equation:

$$E_{hr} = (1.92 \text{ gal/hr}) * (3.5 \text{ lbs VOC/gal})$$
 - c. Emissions Limitation:

Precision Door & Glass Inc
PTI Application: 02-14513
Issued: To be entered upon final issuance

Facility ID: 0238000159
Emissions Unit ID: R007

12.0 tons of VOC emissions per rolling, 12-month period from all coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.3.g.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F, except C.6, C.7, C.8 and C.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>
R008 - Protect aire 15x15x10 spray booth for the application of topcoat to metal and fiberglass doors, followed by an IR oven.	OAC Rule 3745-31-05(A)(3)	See 2.a and 2.b below. The requirements of this rule also include compliance with the requirements of OAC Rule 3745-21-09(U).
	OAC Rule 3745-21-07(G)	See 2.c below.
	OAC Rule 3745-21-09(U)	See 2.d below.
	OAC Rule 3745-35-07(B)	See 2.b below.

2. Additional Terms and Conditions

- 2.a The VOC emissions from coatings and clean up materials shall not exceed 6.7 pounds per hour. The short term emission limitation for VOC established in A.1 above was established to reflect the potential to emit; therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.
- 2.b The VOC emissions from all coatings and cleanup materials shall not exceed 18.0 tons per rolling, 12-month period.
- 2.c The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA, Northeast District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or

control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

- 2.d** The VOC content of the coatings employed shall not exceed a volume-weighted average of 3.5 lbs per gallon, as applied (excluding water and exempt solvents).

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
2. The annual coating usage in this emissions unit shall not exceed 9714 gallons per rolling, 12-month period, as applied (excluding water and exempt solvents).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) of each coating, as applied.
 - c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - d. The daily VOC emission from all coatings combined, in pounds or tons, (the sum of b times c for each coating.)
 - e. The daily volume-weighted average VOC content of all coatings, as applied, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
3. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month VOC emissions:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material, in pounds per gallon.
 - d. The total VOC emissions from all cleanup materials, in pounds or tons.
 - e. The total VOC emissions from all coatings, in pounds or tons, (the sum of the daily VOC

emissions recorded according to C.2.d.)

- f. The total VOC emissions from all coatings and clean-up materials, in pounds or tons, (sum of d plus e).
 - g. The rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period.
4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month coating usage:
- a. The number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.2.b.)
 - b. The rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
5. The permittee shall retain all records according to A.3. of the General Terms and Conditions.
6. The permit to install for this emissions unit R008 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: Methyl n-amyl ketone

TLV (mg/m³): 184.3

Maximum Hourly Emission Rate (lbs/hr): 3.69

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 110

Predicted 1-Hour Maximum Ground-Level Concentration, sum of R003, R004, R007 and R008, combined (ug/m³): 2274

MAGLC (ug/m³): 4388

7. 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 still

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.).
8. 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.
9. 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 notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were 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 Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

2. The permittee shall submit quarterly reports which include the following information from this emission unit:
 - a. An identification of each day during which the VOC content of the daily volume-weighted average of coatings employed exceeded 3.5 pounds per gallon and the actual VOC content of each such coatings employed.
 - b. The total VOC emissions from all coatings and cleanup materials, pounds or tons.
 - c. The total coating usage, in gallons as applied (excluding water and exempt solvents).

The quarterly reports shall be submitted in accordance with the General Terms and Conditions.

3. The permittee shall also submit annual reports which summarize the following information:
 - a. the total emissions of VOC from this emission unit; and
 - b. the total coating usage of this emissions unit.

The reports shall include the emissions calculations, shall be submitted by January 31 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
3.5 lbs/gal volume-weighted average VOC content of all coatings, as applied.

Applicable Compliance Method:
Compliance shall be determined by the value recorded in C.2.e calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
 - b. Emissions Limitation:
6.7 lbs VOC per hour

Applicable Compliance Method:
Compliance shall be determined by multiplying the maximum coating usage rate times the permit allowable VOC content per gallon of coating, as applied, according to the following equation:

$$E_{hr} = (1.92 \text{ gal/hr}) * (3.5 \text{ lbs VOC/gal})$$
 - c. Emissions Limitation:

Precision Door & Glass Inc
PTI Application: 02-14513
Issued: To be entered upon final issuance

Facility ID: 0238000159
Emissions Unit ID: R008

18.0 tons of VOC emissions per rolling, 12-month period from all coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.3.g.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F, except C.6, C.7, C.8 and C.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>
R009 - Protect aire 12x13x10 spray booth for the application of stain to metal and fiberglass doors, followed by a flash-off oven	OAC Rule 3745-31-05(A)(3)	See 2.a, 2.b, 2.d and 2.e below.
	OAC Rule 3745-21-07(G)	See 2.c below.
	OAC Rule 3745-21-09(U)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC Rule 3745-35-07(B)	See 2.b, 2.d and 2.e below.

2. Additional Terms and Conditions

- 2.a The VOC emissions from coatings and clean up materials shall not exceed 1.7 pounds per hour.
- 2.b The VOC emissions from all coatings and cleanup materials shall not exceed 8.0 tons per rolling, 12-month period.
- 2.c The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA, Northeast District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

2.d The VOC content of the coatings employed shall not exceed 5.3 lbs per gallon, as applied (excluding water and exempt solvents).

2.e The permittee shall employ no more than 7.8 gallons of coating per day, as applied.

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
2. The annual coating usage in this emissions unit shall not exceed 2847 gallons per rolling, 12-month period, as applied (excluding water and exempt solvents).

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) of each coating, as applied.
 - c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - d. The daily VOC emission from all coatings combined, in pounds or tons, (the sum of b times c for each coating.)
 - e. The actual operating hours of this emissions unit.
 - f. The average hourly VOC emissions rate, (d divided by e).
3. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month VOC emissions:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material, in pounds per gallon.
 - d. The total VOC emissions from all cleanup materials, in pounds or tons.

- e. The total VOC emissions from all coatings, in pounds or tons, (the sum of the daily VOC emissions recorded according to C.2.d.)
 - f. The total VOC emissions from all coatings and clean-up materials, in pounds or tons, (sum of d plus e).
 - g. The rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period.
4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month coating usage:
- a. The number of number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.2.b.)
 - b. The rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
5. The permittee shall retain all records according to A.3. of the General Terms and Conditions.
6. The permit to install for this emissions unit R009 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: Mineral spirits

TLV (mg/m3): 572.6

Maximum Hourly Emission Rate (lbs/hr): 7.83

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 364

Predicted 1-Hour Maximum Ground-Level Concentration sum of K005, K009 and K010 (ug/m3): 2231

MAGLC (ug/m3): 13,633

7. 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.).
8. 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.
9. 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 notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were 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 Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
2. The permittee shall submit quarterly reports which include the following information from this emission unit:
 - a. An identification of each day during which the VOC content of any coating exceeded 5.3 pounds per gallon and the actual VOC content of each such coating employed.
 - b. An identification of each day during which the average hourly VOC emissions rate exceeded 1.7 pounds and the actual emissions rate of each such day.
 - c. The VOC emissions from all coatings and cleanup materials, in pounds or tons.
 - d. The total gallons of coating employed.

The quarterly reports shall be submitted in accordance with the General Terms and Conditions.

3. The permittee shall also submit annual reports which summarize the following information:
 - a. The total emissions of VOC from this emission unit.
 - b. The total coating usage of this emissions unit.

The reports shall include the emissions calculations, shall be submitted by January 31 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
5.3 lbs of VOC per gallon of coating, as applied.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.2.e calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

Precision Door & Glass Inc
PTI Application: 02-14513
Issued: To be entered upon final issuance

Facility ID: 0238000159
Emissions Unit ID: R009

- b. Emissions Limitation:
1.7 lbs VOC per hour

Applicable Compliance Method:
Compliance shall be determined base upon the value recorded in C.2.f.

- c. Emissions Limitation:
7.8 gallons of coating per day

Applicable Compliance Method:
Compliance shall be determined base upon the sum of the values recorded in C.2.c.

- d. Emissions Limitation:
8.0 tons of VOC emissions per rolling, 12-month period from all coatings and cleanup materials.

Applicable Compliance Method:
Compliance shall be determined base upon the value recorded in C.3.g.

- 2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

- 1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F, except C.6, C.7, C.8 and C.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>
R010 - Protect aire 12x13x10 spray booth for the application of stains to metal and fiberglass doors, followed by aflash-off oven.	OAC Rule 3745-31-05(A)(3)	See 2.a, 2.b, 2.d and 2.e below.
	OAC Rule 3745-21-07(G)	See 2.c below.
	OAC Rule 3745-21-09(U)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC Rule 3745-35-07(B)	See 2.b, 2.d and 2.e below.

2. Additional Terms and Conditions

- 2.a The VOC emissions from coatings and clean up materials shall not exceed 1.7 pounds per hour.
- 2.b The VOC emissions from all coatings and cleanup materials shall not exceed 7.0 tons per rolling, 12-month period.
- 2.c The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA, Northeast District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

2.d The VOC content of the coatings employed shall not exceed 5.3 lbs per gallon, as applied (excluding water and exempt solvents).

2.e The permittee shall employ no more than 7.8 gallons of coating per day, as applied.

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
2. The annual coating usage in this emissions unit shall not exceed 2445 gallons per rolling, 12-month period, as applied excluding water and exempt solvents.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information each day for the line:
 - a. The name and identification number of each coating, as applied.
 - b. The VOC content (excluding water and exempt solvents) of each coating, as applied.
 - c. The number of gallons (excluding water and exempt solvents) of each coating, as applied.
 - d. The daily VOC emission from all coatings combined, in pounds or tons, (the sum of b times c for each coating.)
 - e. The actual operating hours of this emissions unit.
 - f. The average hourly VOC emissions rate, (d divided by e).
3. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month VOC emissions:
 - a. The name and identification of each cleanup material employed.
 - b. The number of gallons of each cleanup material employed.
 - c. The VOC content of each cleanup material, in pounds per gallon.
 - d. The total VOC emissions from all cleanup materials, in pounds or tons.

- e. The total VOC emissions from all coatings, in pounds or tons, (the sum of the daily VOC emissions recorded according to C.2.d.)
 - f. The total VOC emissions from all coatings and clean-up materials, in pounds or tons, (sum of d plus e).
 - g. The rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period.
4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month coating usage:
- a. The number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.2.b.)
 - b. The rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
5. The permittee shall retain all records according to the General Terms and Conditions.
6. The permit to install for this emissions unit R010 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: Mineral spirits

TLV (mg/m3): 572.6

Maximum Hourly Emission Rate (lbs/hr): 7.83

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 364

Predicted 1-Hour Maximum Ground-Level Concentration sum of K005, K009 and K010 (ug/m3): 2231

MAGLC (ug/m3): 13,633

7. 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.).
8. 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.
9. 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 notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were 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 Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
2. The permittee shall submit quarterly reports which include the following information from this emission unit:
 - a. An identification of each day during which the VOC content of any coating exceeded 5.3 pounds per gallon and the actual VOC content of each such coating employed.
 - b. An identification of each day during which the average hourly VOC emissions rate exceeded 1.7 pounds and the actual emissions rate of each such day.
 - c. The VOC emissions, in pounds or tons.
 - d. The total gallons of coating employed.

The quarterly reports shall be submitted in accordance with the General Terms and Conditions.

3. The permittee shall also submit annual reports which summarize the following information:
 - a. The total emissions of VOC from this emission unit.
 - b. The total coating usage of this emissions unit.

The reports shall include the emissions calculations, shall be submitted by January 31 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
5.3 lbs of VOC per gallon of coating, as applied.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.2.e calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

Precision Door & Glass Inc
PTI Application: 02-14513
Issued: To be entered upon final issuance

Facility ID: 0238000159
Emissions Unit ID: R010

- b. Emissions Limitation:
1.7 lbs VOC per hour

Applicable Compliance Method:
Compliance shall be determined base upon the value recorded in C.2.f.

- c. Emissions Limitation:
7.8 gallons of coating per day

Applicable Compliance Method:
Compliance shall be determined base upon the value recorded in C.2.c.

- d. Emissions Limitation:
7.0 tons of VOC emissions per rolling, 12-month period from all coatings and cleanup materials.

Applicable Compliance Method:
Compliance shall be determined base upon the sum of the values recorded in C.3.g.

- 2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

- 1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F, except C.6, C.7, C.8 and C.9.

NEW SOURCE REVIEW FORM B

PTI Number: 02-14513

Facility ID: 0238000159

FACILITY NAME Precision Door & Glass Inc

FACILITY DESCRIPTION door manufacturing facility CITY/TWP Sugarcreek

SIC CODE 3442 SCC CODE 4-02-02-501 EMISSIONS UNIT ID R003

EMISSIONS UNIT DESCRIPTION Automated Binks HVLP electrostatic spray operation for the coating of steel and fiberglass doors, with flash-off oven.

DATE INSTALLED 12/94

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	6.7 lbs/hr	7.0	6.7 lbs/hr	10.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC rule 3745-21-07(G), OAC rule 3745-21-09(U), 6.7 lbs/hr, 10.0 tpy, engineering judgement and similar sources

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES NO

IDENTIFY THE AIR CONTAMINANTS: methyl n-amyl ketone

NEW SOURCE REVIEW FORM B

PTI Number: 02-14513

Facility ID: 0238000159

FACILITY NAME Precision Door & Glass Inc

FACILITY DESCRIPTION door manufacturing facility CITY/TWP Sugarcreek

SIC CODE 3442 SCC CODE 4-02-02-501 EMISSIONS UNIT ID R004

EMISSIONS UNIT DESCRIPTION Binks HVLP manual spray operation for the coating of steel and fiberglass doors, with flash-off oven

DATE INSTALLED 12/94

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	4.4 lbs/hr	4.6	4.4 lbs/hr	10.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC rule 3745-21-07(G), OAC rule 3745-21-09(U), 4.4 lbs/hr, 10.0 tpy, engineering judgement and similar sources

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: methyl n-amyl ketone

NEW SOURCE REVIEW FORM B

PTI Number: 02-14513

Facility ID: 0238000159

FACILITY NAME Precision Door & Glass Inc

FACILITY DESCRIPTION door manufacturing facility CITY/TWP Sugarcreek

SIC CODE 3442 SCC CODE 4-02-02-501 EMISSIONS UNIT ID R005

EMISSIONS UNIT DESCRIPTION Manual application using HVLP Binks spray gun of stain. Manual brushing of doors also conducted, with IR oven.

DATE INSTALLED 12/94

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	0.4 lbs/hr	0.2	1.7 lbs/hr 4.41 lbs/d	8.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC rule 3745-21-07(G), 5.3 lbs VOC/gal, 1.7 lbs/hr, 8.0 tpy, engineering judgement and similar sources

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: mineral spirits

NEW SOURCE REVIEW FORM B

PTI Number: 02-14513

Facility ID: 0238000159

FACILITY NAME Precision Door & Glass Inc

FACILITY DESCRIPTION door manufacturing facility CITY/TWP Sugarcreek

SIC CODE 3442 SCC CODE 4-02-02-501 EMISSIONS UNIT ID R006

EMISSIONS UNIT DESCRIPTION Protect aire 15x15x10 spray booth for the application of primer to metal doors, with IR oven.

DATE INSTALLED 4/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	1.2 lbs/hr	1.3	4.4 lbs/hr	6.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC rule 3745-21-07(G), 2.3 lbs VOC/gal, 4.4 lbs/hr, 6.0 tpy, engineering judgement and similar sources

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES x NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 02-14513

Facility ID: 0238000159

FACILITY NAME Precision Door & Glass Inc

FACILITY DESCRIPTION door manufacturing facility CITY/TWP Sugarcreek

SIC CODE 3442 SCC CODE 4-02-02-501 EMISSIONS UNIT ID R007

EMISSIONS UNIT DESCRIPTION Protect aire 10x13x10 manual spray booth for the application of paint to steel, fiberglass or plastic doors and trim, with a flash-off oven.

DATE INSTALLED 4/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	4.4 lbs/hr	4.6	4.4 lbs/hr	12.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC rule 3745-21-07(G), OAC rule 3745-21-09(U), 4.4 lbs/hr, 12.0 tpy, engineering judgement and similar sources

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: methyl n-amyl ketone

NEW SOURCE REVIEW FORM B

PTI Number: 02-14513

Facility ID: 0238000159

FACILITY NAME Precision Door & Glass Inc

FACILITY DESCRIPTION door manufacturing facility CITY/TWP Sugarcreek

SIC CODE 3442 SCC CODE 4-02-02-501 EMISSIONS UNIT ID R008

EMISSIONS UNIT DESCRIPTION Protect aire 15x15x10 spray booth for the application of topcoat to metal and fiberglass doors, with IR oven.

DATE INSTALLED 4/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	6.72 lbs/hr	7.0	6.7 lbs/hr	18.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC rule 3745-21-07(G), OAC rule 3745-21-09(U), 6.7 lbs/hr, 18.0 tpy, engineering judgement and similar sources

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: methyl n-amyl ketone

NEW SOURCE REVIEW FORM B

PTI Number: 02-14513

Facility ID: 0238000159

FACILITY NAME Precision Door & Glass Inc

FACILITY DESCRIPTION door manufacturing facility CITY/TWP Sugarcreek

SIC CODE 3442 SCC CODE 4-02-02-501 EMISSIONS UNIT ID R009

EMISSIONS UNIT DESCRIPTION Protect aire 12x13x10 spray booth for the application of stain to metal and fiberglass doors, with flash-off oven

DATE INSTALLED 4/01

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	0.4 lbs/hr	0.5	1.7 lbs/hr 41.3 lbs/d	8.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with OAC rule 3745-21-07(G), 5.3 lbs VOC/gal, 1.7 lbs/hr, 8.0 tpy, engineering judgement and similar sources

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? x YES _____ NO _____

IDENTIFY THE AIR CONTAMINANTS: mineral spirits

NEW SOURCE REVIEW FORM B

PTI Number: 02-14513

Facility ID: 0238000159

FACILITY NAME Precision Door & Glass Inc

FACILITY DESCRIPTION door manufacturing facility CITY/TWP Sugarcreek

SIC CODE 3442 SCC CODE 4-02-02-501 EMISSIONS UNIT ID R010

EMISSIONS UNIT DESCRIPTION Protect aire 12x13x10 spray booth for the application of stains to metal and fiberglass doors, with flash-off oven.

DATE INSTALLED 3/02

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	0.4 lbs/hr	0.5	1.7 lbs/hr, 41.3 lbs/d	7.0
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC rule 3745-21-07(G), 5.3 lbs VOC/gal, 1.7 lbs/hr, 8.0 tpy, engineering judgement

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? _____

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 02-14513

Facility ID: 0238000159

FACILITY NAME Precision Door & Glass Inc

FACILITY DESCRIPTION door manufacturing facility CITY/TWP Sugarcreek

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us**

<i>Please fill out the following. If the checkbox does not work, replace it with an 'X'</i>	<u>Electroni</u> <u>c</u>	<u>Additional information File</u> <u>Name Convention (your PTI</u> <u># plus this letter)</u>	<u>Hard</u> <u>Copy</u>	<u>None</u>
Calculations (required)	<input checked="" type="checkbox"/>	0214513c.wpd	<input type="checkbox"/>	
Modeling form/results	<input type="checkbox"/>	0000000s.wpd	<input checked="" type="checkbox"/>	<input type="checkbox"/>
PTI Application (complete or partial)*	<input type="checkbox"/>	0000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
BAT Study	<input type="checkbox"/>	0000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other/misc.	<input type="checkbox"/>	0000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

All eight coating booths coat both metal and non-metal, thus are subject to both 21-09(U) and 21-07(G). All coatings used are not PRM and thus no emissions limits from 21-07(G) apply. R003, R004, R007 and R008 applies architectural coatings (designed to withstand outdoor weather), thus have a limit from 21-09(U) of 3.5 lbs VOC/gal coating, as applied. These emissions units will meet the limit using daily volume weighted averages. R006 applies primer, thus 21-09(U) of 3.5 lbs/gal is applicable (BAT is more stringent). No vwa is needed. R005, R009 and R010 apply stains, non-compliant coating, thus will limit usage to below 10 gallons per day. (facility located in Holmes Co.)

The facility is a major source according to Title V, with the PTE of 164 tpy of VOC. PTE for single and combined HAPs is less than 1 tpy. The facility requested a SM PTI to limit the emission to 79 tons per rolling-12 month period, thus avoiding Title V and also a BAT study.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination
Permit To Install 02-14513

A. Source Description

This PTI is for the installation of five (5) new spray booths (R006 - R010) and for three (3) existing spray booths (R003 - R005). The booths finish both metal and fiberglass exterior entry way doors for homes. R003 and R008 are equipped with robotic, HVLP electrostatic guns for the application of topcoat and sealer, and followed by flash-off ovens set at 160 degrees F. R006 is equipped with robotic, HVLP electrostatic guns for the application of water based primer and followed by an IR oven set at 160 degrees F. R004 and R007 are equipped with manual HVLP guns for the application of topcoat and sealer and followed by a flash-off oven set at 160 degrees F. R005, R009 and R010 are equipped with manual guns for the application of stains and the doors are hand wiped and followed by IR ovens set at 160 degrees F. Doors follow an overhead track system

NEW SOURCE REVIEW FORM B

PTI Number: 02-14513

Facility ID: 0238000159

FACILITY NAME Precision Door & Glass Inc

FACILITY DESCRIPTION door manufacturing facility CITY/TWP Sugarcreek

through the plant.

B. Facility Emissions and Attainment Status

The facility is located in Holmes County, which is attainment for all criteria pollutants. The facility is a major source according to Title V for VOC, with the PTE of 164.9 tons per year. Potential HAP emissions were evaluated and are less than 1 ton per year. Actual emissions of VOC were 24.6 tons in 2000.

C. Source Emissions

The facility has requested a Synthetic Minor PTI that includes all eight emissions units. Each emissions unit is limited separately with a tons of VOC per rolling, 12-month period. Clean-up material is included in the tons of VOC per rolling, 12-month period. All emissions units have a operational limit in gallons of coating applied, in gallons per rolling, 12-month period.

Emissions unit	VOC limit, tons per 12-month	Operational limit and BAT VOC content
R003	10.0	5142 gal/12-month, 3.5 lbs VOC/gal
R004	10.0	5142 gal/12-month, 3.5 lbs VOC/gal
R005	8.0	2847 gal/12-month, 5.3 lbs VOC/gal
R006	6.0	5217 gal/12-month, 2.3 lbs VOC/gal
R007	12.0	6286 gal/12-month, 3.5 lbs VOC/gal
R008	18.0	9714 gal/12-month, 3.5 lbs VOC/gal
R009	8.0	2847 gal/12-month, 5.3 lbs VOC/gal
R010	7.0	2445 gal/12-month, 5.3 lbs VOC/gal
total	79 tons per 12-month period	

The terms and conditions also include daily record keeping of the coating usage and a monthly summation of the coating used and the VOC emissions during the previous 12-month period. The permittee is required to submit quarterly deviation reports identifying any month that the coating usage or emissions limit was exceeded and to submit an annual report of the coating usage and calculated VOC emissions.

D. Conclusion

The emission limits contained in these synthetic minors PTIs are adequate to provide federally enforceable limitations for ensuring that the applicable Title V thresholds will not be exceeded.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

SUMMARY (for informational purposes only)

NEW SOURCE REVIEW FORM B

PTI Number: 02-14513

Facility ID: 0238000159

FACILITY NAME Precision Door & Glass Inc

FACILITY DESCRIPTION door manufacturing facility

CITY/TWP Sugarcreek

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant
voc

Tons Per Year
79.0