

**Synthetic Minor Determination and/or**  **Netting Determination**  
**Permit To Install 02-14513m1**

**A. Source Description**

This PTI is for re-permitting eight (8) spray booths (R003 - R010) to adjust the synthetic minor limits established in the previous permit. The booths finish both metal and fiberglass exterior entry way doors and jambs 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 miscellaneous coatings 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 and PSD for VOC, with the PTE of 734.6 tons per year. Potential HAP emissions were evaluated and are less than 5 ton per year. Actual emissions of VOC were 13.5 tons in 2001. The previous PTI 02-14513 was issued April 12, 2001, and limited facility emissions to 79 tons per rolling, 12-month period.

**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. All emissions units have a operational limit in gallons of coating applied, in gallons per rolling, 12-month period. Cleanup material is water or exempt solvents.

Emissions unit	VOC limit, tons per 12-month	Operational limit and BAT VOC content
R003	11.8	6750 gal/12-month, 3.5 lbs VOC/gal
R004	8.8	5000 gal/12-month, 3.5 lbs VOC/gal
R005	9.9	3750 gal/12-month, 5.3 lbs VOC/gal
R006	9.8	8500 gal/12-month, 2.3 lbs VOC/gal
R007	9.2	5250 gal/12-month, 3.5 lbs VOC/gal
R008	19.7	11,250 gal/12-month, 3.5 lbs VOC/gal
R009	5.3	2000 gal/12-month, 5.3 lbs VOC/gal
R010	3.5	2000 gal/12-month, 3.5 lbs VOC/gal
total	78 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 and PSD 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 MODIFICATION**

**HOLMES COUNTY**

**Application No: 02-14513**

**CERTIFIED MAIL**

**DATE:** 10/29/2002

Precision Door and Glass Inc  
Scott Tritt  
2150 State Route 39  
Sugarcreek, OH 446819201

Y	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
Y	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 modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of **\$ 900** 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,

Michael W. Ahern, Supervisor  
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 MODIFICATION OF 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 and Glass Inc

Person to Contact: Scott Tritt

Address: 2150 State Route 39  
Sugar creek, OH 446819201

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

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

Description of proposed emissions unit(s):

**Administrative modification to PTI 02-14513 issued on 12/1/00 to adjust the allowable emission limits.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

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	78

**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, with flash-off oven.	OAC Rule 3745-31-05(A)(3)	See A.2.a, A.2.b, A.2.c, A.2.d and A.2.e below.
	OAC Rule 3745-21-07(G)	See A.2.d below.
	OAC Rule 3745-21-09(U)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC Rule 3745-31-05(D)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a The VOC emissions from coatings shall not exceed 266.3 pounds per day.
- 2.b The VOC emissions from all coatings shall not exceed 11.8 tons per rolling, 12-month period.
- 2.c The permittee shall employ only water and exempt solvents as cleanup material.
- 2.d 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.e** The VOC content of metal and non-metal coatings employed shall not exceed a daily 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 6750 gallons per rolling, 12-month period, as applied, excluding water and exempt solvents. The permittee has existing production records such that there is no need for first year monthly usage limitations.

**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 maintain daily records that document all times cleanup material other than water or exempt solvents are employed.
3. The permittee shall collect and record the following information each day for the line:
  - a. the name and identification number of each coating;
  - 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); and
  - 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.

Note: If the VOC content of all the coatings is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvent, the daily volume-weight average VOC content record is not required.

4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of VOC emissions:
  - a. the total VOC emissions from all coatings, in pounds or tons, ( the sum of the daily VOC emissions recorded according to C.3.d); and

- b. the rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period.
5. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of coating usage, as applied, excluding water and exempt solvents:
  - a. the number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.3.c); and
  - b. the rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
6. The permittee shall retain all records according the General Terms and Conditions.
7. 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):
  - a. Pollutant: Acetone  
  
TLV (mg/m3): 1,188  
  
Maximum Hourly Emission Rate (lbs/hr): 6.2  
  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 402  
  
Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 6951  
  
MAGLC (ug/m3): 28,289
  - b. Pollutant: Xylene  
  
TLV (mg/m3): 434  
  
Maximum Hourly Emission Rate (lbs/hr): 0.37  
  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 24.1

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 417

MAGLC (ug/m3): 10,339

c. Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 0.99

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 64

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 1,112

MAGLC (ug/m3): 23,410.3

d. Pollutant: Isobutyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 1.6

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 105

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 1,807

MAGLC (ug/m3): 16,973

e. Pollutant: Methyl n-ketone

TLV (mg/m3): 234

Maximum Hourly Emission Rate (lbs/hr): 2.6

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

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 2,943

MAGLC (ug/m3): 5,560

8. 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.).
9. 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.
10. 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 in writing of any daily record showing that:

- a. the dry filters were not in service when the emissions unit was in operation; or
- b. cleanup material other than water or exempt solvents were employed.

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 VOC emissions exceeded the limit specified above;
  - b. all exceedences of the rolling, 12-month VOC limit; and
  - c. all exceedences of the rolling, 12-month coating limit.

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

3. The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of any monthly record showing the use of a daily volume-weighted average greater than 3.5 pounds VOC/gal. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA Northeast District Office) within 45 days following the exceedance.
4. 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, excluding water and exempt solvent.

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 daily volume-weighted average VOC content, of all coatings, as applied, excluding water and exempt solvents.

### **Applicable Compliance Method:**

Compliance shall be determined by the value recorded in C.3.e calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

Page 12 of 61

**Precision Door and Glass Inc**

**PTI Application: 02-14513**

**Issued: To be entered upon final issuance**

**Facility ID: 0238000159**

**Emissions Unit ID: R003**

- b. Emission Limitation:  
266.3 lbs of VOC per day

Applicable Compliance Method:  
Compliance shall be determined by the records required in Section C.3.d.

- c. Emissions Limitation:  
11.8 tons of VOC emissions per rolling, 12-month period from all coatings.

Applicable Compliance Method:  
Compliance shall be determined by the value recorded in C.4.b.

- 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.7, C.8, C.9 and C.10.

**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, with flash-off oven	OAC Rule 3745-31-05(A)(3)	See A.2.a, A.2.b, A.2.c, A.2.d and A.2.e below.
	OAC Rule 3745-21-07(G)	See A.2.d below.
	OAC Rule 3745-21-09(U)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC Rule 3745-35-07(B)	See A.2.b below.
	OAC Rule 3745-31-05(D)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a The VOC emissions from coatings shall not exceed 403.2 pounds per day.
- 2.b The VOC emissions from all coatings shall not exceed 8.8 tons per rolling, 12-month period.
- 2.c The permittee shall employ only water and exempt solvents as cleanup material.
- 2.d 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.e** The VOC content of metal and non-metal coatings employed shall not exceed a daily 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 5000 gallons per rolling, 12-month period, as applied, excluding water and exempt solvents. The permittee has existing production records such that there is no need for first year monthly usage limitations.

**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 maintain daily records that document all times cleanup material other than water or exempt solvents are employed.
3. The permittee shall collect and record the following information each day for the line:
  - a. the name and identification number of each coating;
  - 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); and
  - 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.

Note: If the VOC content of all the coatings is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvent, the daily volume-weight average VOC content record is not required.

4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of VOC emissions:

- a. the total VOC emissions from all coatings, in pounds or tons, ( the sum of the daily VOC emissions recorded according to C.3.d); and
  - b. the rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period.
5. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of coating usage, as applied, excluding water and exempt solvents:
- a. the number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.3.c); and
  - b. the rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
6. The permittee shall retain all records according the General Terms and Conditions.
7. 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):
- a. Pollutant: Acetone  
  
TLV (mg/m3): 1,188  
  
Maximum Hourly Emission Rate (lbs/hr): 4.6  
  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 242  
  
Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 6951  
  
MAGLC (ug/m3): 28,289
  - b. Pollutant: Xylene  
  
TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 0.27

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.5

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 417

MAGLC (ug/m3): 10,339

c. Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 0.73

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 38.7

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 1,112

MAGLC (ug/m3): 23,410

d. Pollutant: Isobutyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 1.86

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 63

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 1,807

MAGLC (ug/m3): 16,973

e. Pollutant: Methyl n-ketone

TLV (mg/m3): 233.5

Maximum Hourly Emission Rate (lbs/hr): 1.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 102

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 2,943

MAGLC (ug/m3): 5,560

8. 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.).
9. 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.
10. 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 in writing of any daily record showing that:
  - a. the dry filters were not in service when the emissions unit was in operation; or
  - b. cleanup material other than water or exempt solvents were employed.

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 coatings employed exceeded a daily volume-weighted average of 3.5 pounds per gallon, as applied, excluding water and exempt solvent, and the actual VOC content of each such coatings employed;
  - b. an identification of each day VOC emissions exceeded the limit specified above;
  - c. all exceedences of the rolling, 12-month VOC limit; and
  - d. all exceedences of the rolling, 12-month coating limit.

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, excluding water and exempt solvent..

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 daily volume-weighted average VOC content of all coatings, as applied.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.3.e calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

b. Emission Limitation:

403.2 lbs of VOC per day

Applicable Compliance Method:

Compliance shall be determined by the records required in Section C.3.d.

c. Emissions Limitation:

8.8 tons of VOC emissions per rolling, 12-month period from all coatings.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.4.b.

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.7, C.8, C.9 and C.10.

**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 and paints to metal and non-metal doors and trim. Manual brushing of doors also conducted, with IR oven.	OAC Rule 3745-31-05(A)(3)	See A.2.a, A.2.b, A.2.c, A.2.d, and A.2.f 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 A.2.d below.
	OAC Rule 3745-21-09(U)	See A.2.e below.
	OAC Rule 3745-35-07(B)	See A.2.b below.
	OAC Rule 3745-31-05(D)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a** The VOC emissions from all coatings shall not exceed 668.2 pounds per day.
- 2.b** The VOC emissions from all coatings shall not exceed 9.9 tons per rolling, 12-month period.
- 2.c** The permittee shall employ only water and exempt solvents as cleanup material.
- 2.d** 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.e** The VOC content of all coatings employed on metal parts shall not exceed a daily volume-weighted average of 3.5 lbs per gallon, as applied, excluding water and exempt solvents.
- 2.f** The VOC content of all coatings employed on non-metal parts shall not exceed 5.3 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 3750 gallons per rolling, 12-month period, as applied, excluding water and exempt solvents. The permittee has existing production records such that there is no need for first year monthly usage limitations.

**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 maintain daily records that document all times cleanup material other than water or exempt solvents are employed.
- 3. The permittee shall collect and record the following information each day for the line:
  - a. the name and identification number of each coating;
  - b. the VOC content (excluding water and exempt solvents) of each coating employed on metal substrates, as applied;
  - c. the VOC content (excluding water and exempt solvents) of each coating employed on non-metal substrates, as applied;
  - d. the number of gallons (excluding water and exempt solvents) of each coating, as applied;
  - e. the daily VOC emission from all coatings combined, in pounds or tons, ( the sum of [b times d] for each metal coating plus the sum of [c times d] for each non-metal coating); and
  - f. the daily volume-weighted average VOC content of all metal coatings, as applied, excluding water and exempt solvents, calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

Note: If the VOC content of all the coatings is less than 3.5 lbs per gallon, as applied,

excluding water and exempt solvent, the daily volume-weight average VOC content record is not required.

4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of VOC emissions:
  - a. the total VOC emissions from all coatings, in pounds or tons, ( the sum of the daily VOC emissions recorded according to C.3.e); and
  - b. the rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period.
5. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of coating usage, as applied, excluding water and exempt solvents:
  - a. the number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.3.d); and
  - b. the rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
6. The permittee shall retain all records according the General Terms and Conditions.
7. 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):
  - a. Pollutant: Acetone  
  
TLV (mg/m3): 1,188  
  
Maximum Hourly Emission Rate (lbs/hr):4.6  
  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 174.4

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 6951.0

MAGLC (ug/m3): 28,289.0

b. Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 0.21

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 10.5

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 417.1

MAGLC (ug/m3): 10,338.9

c. Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 0.55

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 27.9

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 1,112.2

MAGLC (ug/m3): 23,410.3

d. Pollutant: Isobutyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 0.89

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 45.3

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 1,807.3

MAGLC (ug/m3): 16,973.4

- e. Pollutant: Methyl n-ketone  
  
TLV (mg/m3): 233.5  
  
Maximum Hourly Emission Rate (lbs/hr): 1.4  
  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 74  
  
Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 2,943  
  
MAGLC (ug/m3): 5,560
- 8. 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.).
- 9. 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.
- 10. 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 in writing of any daily record showing that:

- a. the dry filters were not in service when the emissions unit was in operation; or
- b. cleanup material other than water or exempt solvents were employed.

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 metal coatings employed exceeded a daily volume-weighted average of 3.5 pounds per gallon, as applied, excluding water and exempt solvent, and the actual VOC content of each such coatings employed;
- b. an identification of each day during which the VOC content of non-metal coatings employed exceeded 5.3 pounds per gallon, and the actual VOC content of each such coatings employed;
- c. an identification of each day VOC emissions exceeded the limit specified above;
- d. all exceedences of the rolling, 12-month VOC limit; and
- e. all exceedences of the rolling, 12-month coating limit.

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, excluding water and exempt solvent.

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 of VOC per gallon of metal coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.3.f calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

- b. Emission Limitation:  
5.3 lbs of VOC per gallon of coating, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

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

- c. Emissions Limitation:  
668.2 lbs VOC per day

Applicable Compliance Method:

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

- d. Emissions Limitation:  
9.9 tons of VOC emissions per rolling, 12-month period from all coatings.

Applicable Compliance Method:

Compliance shall be determined base upon the value recorded in C.4.b.

- 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.7, C.8, C.9 and C.10.

**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 with 4 spray gun for the application of primer to doors, with IR oven.	OAC Rule 3745-31-05(A)(3)	See A.2.a, A.2.b, A.2.c, A.2.d and A.2.e below.
	OAC Rule 3745-21-07(G)	See A.2.d 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 A.2.b below.
	OAC Rule 3745-31-05(D)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a The VOC emissions from coatings shall not exceed 701.0 pounds per day.
- 2.b The VOC emissions from all coatings shall not exceed 9.8 tons per rolling, 12-month period.
- 2.c The permittee shall employ only water and exempt solvents as cleanup material.
- 2.d 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.e** The VOC content of metal and non-metal 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 8500 gallons per rolling, 12-month period, as applied, excluding water and exempt solvents. The permittee has existing production records such that there is no need for first year monthly usage limitations.

**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 maintain daily records that document all times cleanup material other than water or exempt solvents are employed.
3. The permittee shall collect and record the following information each day for the line:
  - a. the name and identification number of each coating;
  - b. the VOC content (excluding water and exempt solvents) of each coating, as applied; and
  - 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).
4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of VOC emissions:
  - a. the total VOC emissions from all coatings, in pounds or tons, ( the sum of the daily VOC emissions recorded according to C.3.d); and
  - b. the rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period.

5. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of coating usage, as applied, excluding water and exempt solvents:
  - a. the number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.3.c); and
  - b. the rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
6. The permittee shall retain all records according the General Terms and Conditions.
7. The permit to install for this emissions unit R006 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):
  - a. Pollutant: Acetone  
  
TLV (mg/m3): 1,188  
  
Maximum Hourly Emission Rate (lbs/hr): 7.8  
  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):2,873  
  
Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 6951  
  
MAGLC (ug/m3): 28,289
  - b. Pollutant: Xylene  
  
TLV (mg/m3): 434  
  
Maximum Hourly Emission Rate (lbs/hr): 0.47  
  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 172

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 417

MAGLC (ug/m3): 10,339

- c. Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 1.24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 460

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 1,112

MAGLC (ug/m3): 23,410

- d. Pollutant: Isobutyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 2.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 747

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 1,807

MAGLC (ug/m3): 16,973

- e. Pollutant: Methyl n-ketone

TLV (mg/m3): 234

Maximum Hourly Emission Rate (lbs/hr): 3.28

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,217

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 2,943

MAGLC (ug/m3): 5,560

8. 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.).
9. 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.
10. 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 in writing of any daily record showing that:
  - a. the dry filters were not in service when the emissions unit was in operation; and

- b. clean-up materials other than water exempt solvents were 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 coatings employed exceeded 2.3 pounds per gallon, as applied, excluding water and exempt solvent, and the actual VOC content of each such coatings employed;
  - b. an identification of each day VOC emissions exceeded the limit specified above;
  - c. all exceedences of the rolling, 12-month VOC limit; and
  - d. all exceedences of the rolling, 12-month coating limit.

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, excluding water and exempt solvent.

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, excluding water and exempt solvent.  
  
Applicable Compliance Method:  
Compliance shall be determined by the value recorded in C.3.b.
  - b. Emission Limitation:  
701.0 lbs of VOC per day

Applicable Compliance Method:

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

c. Emissions Limitation:

9.8 tons of VOC emissions per rolling, 12-month period from all coatings.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.4.b.

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, except C.7, C.8, C.9 and C.10.

**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, with a flash-off oven.	OAC Rule 3745-31-05(A)(3)	See A.2.a, A.2.b, A.2.c, A.2.d and A.2.e below.
	OAC Rule 3745-21-07(G)	See A.2.d below.
	OAC Rule 3745-21-09(U)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC Rule 3745-35-07(B)	See A.2.b below.
	OAC Rule 3745-31-05(D)	See A.2.b. below.

**2. Additional Terms and Conditions**

- 2.a The VOC emissions from coatings shall not exceed 403.2 pounds per day.
- 2.b The VOC emissions from all coatings shall not exceed 9.2 tons per rolling, 12-month period.
- 2.c The permittee shall employ only water and exempt solvents as cleanup material.
- 2.d 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.e** The VOC content of metal and non-metal coatings employed shall not exceed a daily 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 5250 gallons per rolling, 12-month period, as applied, excluding water and exempt solvents. The permittee has existing production records such that there is no need for first year monthly usage limitations.

**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 maintain daily records that document all times cleanup material other than water or exempt solvents are employed.
3. The permittee shall collect and record the following information each day for the line:
  - a. the name and identification number of each coating;
  - 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); and
  - 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.

Note: If the VOC content of all the coatings is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvent, the daily volume-weight average VOC content record is not required.

4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of VOC emissions:

- a. the total VOC emissions from all coatings, in pounds or tons, ( the sum of the daily VOC emissions recorded according to C.3.d); and
  - b. the rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period.
5. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of coating usage, as applied, excluding water and exempt solvents:
- a. the number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.3.c); and
  - b. the rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
6. The permittee shall retain all records according the General Terms and Conditions.
7. 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):
- a. Pollutant: Acetone  
  
TLV (mg/m3): 1,188  
  
Maximum Hourly Emission Rate (lbs/hr): 4.8  
  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3):121  
  
Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 6951  
  
MAGLC (ug/m3): 28,289
  - b. Pollutant: Xylene  
  
TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 0.29

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7.3

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 417

MAGLC (ug/m3): 10,339

c. Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 19

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 1,112

MAGLC (ug/m3): 23,410

d. Pollutant: Isobutyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 1.2

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 31

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 1,807

MAGLC (ug/m3): 16,973

e. Pollutant: Methyl n-ketone

TLV (mg/m3): 234

Maximum Hourly Emission Rate (lbs/hr): 2.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 51

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 2,943

MAGLC (ug/m3): 5,560

8. 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.).
9. 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.
10. 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 in writing of any daily record showing that:
  - a. the dry filters were not in service when the emissions unit was in operation; or
  - b. cleanup material other than water or exempt solvents were employed.

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 coatings employed exceeded a daily volume-weighted average of 3.5 pounds per gallon, as applied, excluding water and exempt solvent, and the actual VOC content of each such coatings employed;
  - b. an identification of each day VOC emissions exceeded the limit specified above;
  - c. all exceedences of the rolling, 12-month VOC limit; and
  - d. all exceedences of the rolling, 12-month coating limit.

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, excluding water and exempt solvent.

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 daily volume-weighted average VOC content of all coatings, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.3.e calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

b. Emission Limitation:

403.2 lbs of VOC per day

Applicable Compliance Method:

Compliance shall be determined by the records according to C.3.d.

c. Emissions Limitation:

9.2 tons of VOC emissions per rolling, 12-month period from all coatings.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.4.b.

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.7, C.8, C.9 and C.10.

**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, with IR oven.	OAC Rule 3745-31-05(A)(3)	See A.2.a, A.2.b, A.2.c, A.2.d and A.2.e below.
	OAC Rule 3745-21-07(G)	See A.2.d below.
	OAC Rule 3745-21-09(U)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC Rule 3745-35-07(B)	See A.2.b below.
	OAC Rule 3745-31-05(D)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a The VOC emissions from coatings shall not exceed 1066.8 pounds per day.
- 2.b The VOC emissions from all coatings shall not exceed 19.7 tons per rolling, 12-month period.
- 2.c The permittee shall employ only water and exempt solvents as cleanup material.
- 2.d 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.e** The VOC content of metal and non-metal coatings employed shall not exceed a daily 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 11,250 gallons per rolling, 12-month period, as applied, excluding water and exempt solvents. The permittee has existing production records such that there is no need for first year monthly usage limitations.

**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 maintain daily records that document all times cleanup material other than water or exempt solvents are employed.
3. The permittee shall collect and record the following information each day for the line:
  - a. the name and identification number of each coating;
  - 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); and
  - 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.

Note: If the VOC content of all the coatings is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvent, the daily volume-weight average VOC content record is not required.

4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of VOC emissions:

- a. the total VOC emissions from all coatings, in pounds or tons, (the sum of the daily VOC emissions recorded according to C.3.d); and
  - b. the rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period.
5. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of coating usage, as applied, excluding water and exempt solvents:
- a. the number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.3.c); and
  - b. the rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
6. The permittee shall retain all records according the General Terms and Conditions.
7. 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):
- a. Pollutant: Acetone  
  
TLV (mg/m3): 1,188  
  
Maximum Hourly Emission Rate (lbs/hr): 10.3  
  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2,987  
  
Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 6951  
  
MAGLC (ug/m3): 28,289
  - b. Pollutant: Xylene  
  
TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 0.29

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 179

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 417

MAGLC (ug/m3): 10,339

c. Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 1.24

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 478

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 1,112

MAGLC (ug/m3): 23,410

d. Pollutant: Isobutyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 2.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 777

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 1,807

MAGLC (ug/m3): 16,973

e. Pollutant: Methyl n-ketone

TLV (mg/m3): 234

Maximum Hourly Emission Rate (lbs/hr): 4.3

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1265

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 2,943

MAGLC (ug/m3): 5,560

8. 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.).
9. 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.
10. 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 in writing of any daily record showing that:
  - a. the dry filters were not in service when the emissions unit was in operation; or
  - b. cleanup material other than water or exempt solvents were employed.

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 coatings employed exceeded a daily volume-weighted average of 3.5 pounds per gallon, as applied, excluding water and exempt solvent, and the actual VOC content of each such coatings employed;
  - b. an identification of each day VOC emissions exceeded the limit specified above;
  - c. all exceedences of the rolling, 12-month VOC limit; and
  - d. all exceedences of the rolling, 12-month coating limit.

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, excluding water and exempt solvent.

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 daily volume-weighted average VOC content of all coatings, as applied, excluding water and exempt solvents.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.3.e calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.

- b. Emission Limitation:  
1066.8 lbs of VOC per day

Applicable Compliance Method:

Compliance shall be determined by the records according to C.3.d.

- c. Emissions Limitation:  
19.7 tons of VOC emissions per rolling, 12-month period from all coatings.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.4.b.

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.7, C.8, C.9 and C.10.

**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, with flash-off oven	OAC Rule 3745-31-05(A)(3)	See A.2.a, A.2.b, A.2.c, A.2.d and A.2.e 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 A.2.d below.
	OAC Rule 3745-21-09(U)	See A.2.f below.
	OAC Rule 3745-35-07(B)	See A.2.b below.
	OAC Rule 3745-31-05(D)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a The VOC emissions from coatings shall not exceed 53.0 pounds per day.
- 2.b The VOC emissions from all coatings shall not exceed 5.3 tons per rolling, 12-month period.
- 2.c The permittee shall employ only water and exempt solvents as cleanup material.
- 2.d 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.e** The VOC content of metal and non-metal coatings employed shall not exceed 5.3 lbs per gallon, as applied, excluding water and exempt solvents.
- 2.f** The permittee shall employ no more than 10.0 gallons of coating per day, 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 2000 gallons per rolling, 12-month period, as applied excluding water and exempt solvents. The permittee has existing production records such that there is no need for first year monthly usage limitations.

**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 maintain daily records that document all times cleanup material other than water or exempt solvents are employed.
- 3. The permittee shall collect and record the following information each day for the line:
  - a. the name and identification number of each coating;
  - 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; and
  - d. the daily VOC emission from all coatings combined, in pounds or tons, ( the sum of b times c for each coating).
- 4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of VOC emissions:
  - a. the total VOC emissions from all coatings, in pounds or tons, ( the sum of the daily VOC emissions recorded according to C.3.d); and
  - b. the rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period.

5. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of coating usage, as applied, excluding water and exempt solvents:
  - a. the number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.3.c); and
  - b. the rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
6. The permittee shall retain all records according the General Terms and Conditions.
7. 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):
  - a. Pollutant: Acetone  
  
TLV (mg/m3): 1,188  
  
Maximum Hourly Emission Rate (lbs/hr): 1.8  
  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 58  
  
Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 6951  
  
MAGLC (ug/m3): 28,289
  - b. Pollutant: Xylene  
  
TLV (mg/m3): 434  
  
Maximum Hourly Emission Rate (lbs/hr): 0.11  
  
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3.5  
  
Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 417

MAGLC (ug/m3): 10,339

- c. Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 0.29

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 15

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 1,112

MAGLC (ug/m3): 23,410

- d. Pollutant: Isobutyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 0.47

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 24

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 1,807

MAGLC (ug/m3): 16,973

- e. Pollutant: Methyl n-ketone

TLV (mg/m3): 234

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 39

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m3): 2,943

MAGLC (ug/m3): 5,560

8. 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.).
9. 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.
10. 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 in writing of any daily record showing that:
  - a. the dry filters were not in service when the emissions unit was in operation; or
  - b. cleanup material other than water or exempt solvents were employed.

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 coatings employed exceeded a daily volume-weighted average of 5.3 pounds per gallon, as applied, excluding water and exempt solvent, and the actual VOC content of each such coatings employed;
  - b. an identification of each day the daily coating usage exceeded the limit specified above;
  - c. all exceedences of the rolling, 12-month VOC limit; and
  - d. all exceedences of the rolling, 12-month coating limit.

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, excluding water and exempt solvent.

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/gal VOC content of all coatings, as applied, excluding water and exempt solvent.  
  
Applicable Compliance Method:  
Compliance shall be determined by the value recorded in C.3.b.
  - b. Emission Limitation:  
53.0 lbs of VOC per day  
  
Applicable Compliance Method:  
Compliance shall be determined by the records required in Section C.3.d.
  - c. Emissions Limitation:

5.3 tons of VOC emissions per rolling, 12-month period from all coatings.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.4.b.

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.7, C.8, C.9 and C.10.

**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, with flash-off oven.	OAC Rule 3745-31-05(A)(3)	See A.2.a, A.2.b, A.2.c, A.2.d and A.2.e below.
	OAC Rule 3745-21-07(G)	See A.2.d below.
	OAC Rule 3745-21-09(U)	The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC Rule 3745-35-07(B)	See A.2.b below.
	OAC Rule 3745-31-05(D)	See A.2.b below.

**2. Additional Terms and Conditions**

- 2.a The VOC emissions from coatings shall not exceed 266.3 pounds per day.
- 2.b The VOC emissions from all coatings shall not exceed 3.5 tons per rolling, 12-month period.
- 2.c The permittee shall employ only water and exempt solvents as cleanup material.
- 2.d 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.e The VOC content of metal and non-metal coatings employed shall not exceed a daily 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 2000 gallons per rolling, 12-month period, as applied, excluding water and exempt solvents.

To ensure enforceability during the first 12 calendar months of operation R010, the permittee shall not exceed the coating usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Coating Usage
1	167 gal
1-2	333 gal
1-3	500 gal
1-4	667 gal
1-5	833 gal
1-6	1,000 gal
1-7	1,167 gal
1-8	1,333 gal
1-9	1,500 gal
1-10	1,667 gal
1-11	1,833 gal
1-12	2,000 gal

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling, 12-month summation of the coating usage.

**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 maintain daily records that document all times cleanup material other than water or exempt solvents are employed.

3. The permittee shall collect and record the following information each day for the line:
  - a. the name and identification number of each coating;
  - 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); and
  - 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.

Note: If the VOC content of all the coatings is less than 3.5 lbs per gallon, as applied, excluding water and exempt solvent, the daily volume-weight average VOC content record is not required.
4. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of VOC emissions:
  - a. the total VOC emissions from all coatings, in pounds or tons, ( the sum of the daily VOC emissions recorded according to C.3.c); and
  - b. the rolling, 12-month summation of the VOC emissions from this emissions unit for the previous 12-month period.
5. The permittee shall collect and record the following information monthly for the purpose of determining the rolling, 12-month summation of coating usage, as applied, excluding water and exempt solvents:
  - a. the number of gallons of coating employed at this emissions unit, (the sum of the daily coating usage as recorded in C.3.b); and
  - b. the rolling, 12-month summation of the coating usage in this emissions unit for the previous 12-month period.
6. The permittee shall retain all records according the General Terms and Conditions.
7. 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):

a. Pollutant: Acetone

TLV (mg/m<sup>3</sup>): 1,188

Maximum Hourly Emission Rate (lbs/hr): 1.8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 93

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m<sup>3</sup>): 6951

MAGLC (ug/m<sup>3</sup>): 28,289

b. Pollutant: Xylene

TLV (mg/m<sup>3</sup>): 434

Maximum Hourly Emission Rate (lbs/hr): 0.11

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 5.6

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m<sup>3</sup>): 417

MAGLC (ug/m<sup>3</sup>): 10,339

c. Pollutant: Isopropyl alcohol

TLV (mg/m<sup>3</sup>): 983

Maximum Hourly Emission Rate (lbs/hr): 0.29

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 15

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m<sup>3</sup>): 1,112

MAGLC (ug/m<sup>3</sup>): 23,410

- d. Pollutant: Isobutyl acetate

TLV (mg/m<sup>3</sup>): 713

Maximum Hourly Emission Rate (lbs/hr): 0.47

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 24

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m<sup>3</sup>): 1,807

MAGLC (ug/m<sup>3</sup>): 16,973

- e. Pollutant: Methyl n-ketone

TLV (mg/m<sup>3</sup>): 234

Maximum Hourly Emission Rate (lbs/hr): 0.77

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 39

Predicted 1-Hour Maximum Ground-Level Concentration, sum of emissions units R003, R004, R005, R006, R007, R008, R009 and R010, combined (ug/m<sup>3</sup>): 2,943

MAGLC (ug/m<sup>3</sup>): 5,560

8. 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.).
9. 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.
  10. 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 in writing of any daily record showing that:
  - a. the dry filters were not in service when the emissions unit was in operation; or
  - b. cleanup material other than water or exempt solvents were employed.

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 coatings employed exceeded a daily volume-weighted average of 3.5 pounds per gallon, as applied, excluding water and exempt solvent, and the actual VOC content of each such coatings employed;
  - b. an identification of each day VOC emissions exceeded the limit specified above;
  - c. all exceedences of the rolling, 12-month VOC limit; and
  - d. all exceedences of the rolling, 12-month coating limit.

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, excluding water and exempt solvent.

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 daily volume-weighted average VOC content of all coatings, as applied.  
  
Applicable Compliance Method:  
Compliance shall be determined by the value recorded in C.3.e calculated in accordance with the equation specified in paragraph (B)(9) of OAC rule 3745-21-10 for CVOC,2.
  - b. Emission Limitation:  
266.3 lbs of VOC per day  
  
Applicable Compliance Method:  
Compliance shall be determined by the records required in Section C.3.d.
  - c. Emissions Limitation:  
3.5 tons of VOC emissions per rolling, 12-month period from all coatings.  
  
Applicable Compliance Method:  
Compliance shall be determined by the value recorded in C.4.b.
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.7, C.8, C.9 and C.10.