OhioEPA

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: PERMIT TO INSTALL DIRECT FINAL
KNOX COUNTY
Application No: 01-7880

CERTIFIED MAIL

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

DATE: June 23, 1999

Wenco of Ohio
Jim Baughman
1101 Newark Road
Mount Vernon, OH 43050

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, buy it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

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

cc: USEPA
DAPC, CDO
Patty Richardson Jeld-Wen

DIRECT FINAL PERMIT TO INSTALL 01-7880

Application Number: 01-7880

APS Premise Number: 0142010078

Permit Fee: **$1200**

Name of Facility: Wenco of Ohio

Person to Contact: Jim Baughman
Address: 1101 Newark Road
Mount Vernon, OH 43050

Location of proposed air contaminant source(s) [emissions unit(s)]:
1101 Newark Road
Mount Vernon, **OHIO**

Description of proposed emissions unit(s):
4 COATING BOOTHS.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
OC	84.1
PM	35.9

PART II: SPECIAL TERMS AND CONDITIONS

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Eliminator Line, 2 spray booths, stack S4	OAC rule 3745-31-05	Organic compound (OC) emissions shall not exceed 8.2 pounds per hour and 35.3 tons per year
	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 8 pounds per hour and 40 pounds in any day when using a photochemically reactive material

2. Additional Terms and Conditions

2.a The facility shall use only water in cleanup operations, unless any other said material is included in the coating emission limits contained in Section A.1 and coating records maintained and reported as required in Sections C, D, and E.

B. Operational Restrictions

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

The permittee shall collect and record the following information for each day for the material application operations:

a. the company identification for each coating, mold release agent, cleaning and protectant agent, cleaning solvent, and/or other materials used in the coating booth and the composition and photochemically reactive status of each material employed;

b. the number of gallons or number of pounds of each material employed, in gallons per day, or by weight in pounds per day;

c. the organic compound content of each material, in pounds per gallon or percent by weight;

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

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

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

[Note: The coating information must be for the materials as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

   a. for the days during which only non-photochemically reactive materials were employed, an identification of each day during which the average hourly organic compound emissions from the materials employed in this emissions unit exceeded 8.2 pounds per hour, and the actual average hourly organic compound emissions for each such day;

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and materials employed in this emissions unit exceeded 8 pounds per hour, and the actual organic compound emissions for each such day; and,

   c. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and materials employed exceeded 40 pounds per day, the actual organic compound emissions for each such day.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

1. <u>Hourly Emission Limitation for Coating Application</u>

   8.2 lbs OC/hr

 <u>Applicable Compliance Method</u>

Compliance with the hourly OC limit shall be determined through daily recordkeeping of coating and material usage, the organic compound content of each coating and material used, hours of operation, and the summation of the calculated OC emissions from each material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the materials. Daily emissions shall be calculated by multiplying the OC content of all materials used (lbs OC/gallon of material or % OC by weight) times each coating and material's usage each day; these emissions shall be summed for all materials used. Average hourly emissions shall be calculated by dividing the total daily calculated emissions by the hours of operation. Calculations shall be documented as follows:

OC emissions/day = ∑ (lbs OC/gal material) x (material usage in gal/day) +.... or

OC emissions/day = ∑ (% OC in material by weight) x (material usage in lbs/day)+... and

OC emissions/hr = OC emissions per day / hours of operation per day

2. Hourly and Daily Emission Limitation

8 pounds per hour and 40.0 lbs OC/day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the hourly and daily OC limit, when using photochemically reactive materials, shall be determined through daily recordkeeping of material usage, the organic compound content of each material used, the photochemically reactive status of all materials, hours of operation, and the summation of the calculated OC emissions from each material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the materials. Daily emissions shall be calculated by multiplying the OC content of all materials used (lbs OC/gallon of material or % OC by weight) times each material's usage each day; these emissions shall be summed, for all materials used. Average hourly emissions shall be calculated by dividing the total daily calculated emissions by the hours of operation. Calculations shall be documented as follows:

OC emissions/day = ∑ (lbs OC/gal material) x (material usage in gal/day) + ... or

OC emissions/day = ∑ (% OC in material by weight) x (material usage in lbs/day) +...

OC emissions/hr = OC emissions per day / hours of operation per day

3. Annual Emission Limitation

35.3 tons OC year

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through daily or monthly recordkeeping

of material usage and the organic compound content of each material used. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the materials. Monthly emissions, which may be derived from daily emission calculations or re-calculated from monthly material usage records, shall be added at the end of each year, to show compliance with this limit.

F. Miscellaneous Requirements

Air Toxic Policy

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

PART II: SPECIAL TERMS AND CONDITIONS [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Sill Line, 1 spray booth stack S2	OAC rule 3745-31-05	Organic compound emissions shall not exceed 0.5 pound per hour and 2.0 tons per year from all coatings used in this emissions unit
	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 40 pounds in any day when using a photochemically reactive material

2. Additional Terms and Conditions

2.a The facility shall use only water in cleanup operations, unless any other said material is included in the coating emission limits contained in Section A.1 and coating records maintained and reported as required in Sections C, D, and E.

B. Operational Restrictions

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

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

a. the company identification for each coating and material used in the coating booth and the composition and photochemically reactive status of each material employed;

b. the number of gallons or number of pounds of each coating and material employed, in gallons per day, or by weight in pounds per day;

c. the organic compound content of each coating and material, in pounds per gallon or percent by

weight;

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

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

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

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

   a. an identification of each day during which the average hourly organic compound emissions from all coatings and materials employed in this emissions unit exceeded 0.5 pounds per hour, and the actual average hourly organic compound emissions for each such day; and,

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and materials employed in this emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

2. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

1. <u>Hourly Emission Limitation for Coating Application</u>

   0.5 lb OC/hr

   <u>Applicable Compliance Method</u>

   Compliance with the hourly OC limit shall be determined through daily recordkeeping of coating and material usage, the organic compound content of each coating and material used, hours of operation, and the summation of the calculated OC emissions from each material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and materials. Daily emissions shall be calculated by multiplying the OC content of all materials used

(lbs OC/gallon of material or % OC by weight) times each coating and material's usage each day; these emissions shall be summed for all materials used. Average hourly emissions shall be calculated by dividing the total daily calculated emissions by the hours of operation. Calculations shall be documented as follows:

OC emissions/day = ∑ (lbs OC/gal coating) x (coating usage in gal/day) + (lbs OC/gal material) x (material usage in gal/day) +... or

OC emissions/day = ∑ (% OC in coating by weight) x (coating usage in lbs/day) + (% OC in material by weight) x (material usage in lbs/day) +... and

OC emissions/hr = OC emissions per day / hours of operation per day

2. Daily Emission Limitation

40.0 lbs OC/day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the daily OC limit, when using photochemically reactive materials, shall be determined through daily recordkeeping of coating and material usage, the organic compound content of each coating and material used, the photochemically reactive status of all materials, hours of operation, and the summation of the calculated OC emissions from each material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and materials. Daily emissions shall be calculated by multiplying the OC content of all materials used (lbs OC/gallon of material or % OC by weight) times each coating and material's usage each day; these emissions shall be summed, for all coatings and materials used. Calculations shall be documented as follows:

OC emissions/day = ∑ (lbs OC/gal coating) x (coating usage in gal/day) + (lbs OC/gal material) x (material usage in gal/day) +... or

OC emissions/day = ∑ (% OC in coating by weight) x (coating usage in lbs/day) + (% OC in material by weight) x (material usage in lbs/day) +...

3. Annual Emission Limitation

2.0 tons OC year

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through daily or monthly recordkeeping of coating and material usage and the organic compound content of each coating and material used. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and materials. Monthly emissions, which may be derived from daily emission calculations or re-calculated from monthly material usage records, shall be added at the end of each year, to show compliance with this limit.

F. Miscellaneous Requirements

Air Toxic Policy

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

PART II: SPECIAL TERMS AND CONDITIONS [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Sash Line, 1 spray booth, stack S1	OAC rule 3745-31-05	Organic compound emissions shall not exceed 5.33 pounds per hour and 23.4 tons per year; and Particulate emissions shall not exceed 4.10 pounds per hour and 18.0 tons per year
	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 40 pounds in any day when using a photochemically reactive material
	OAC rule 3745-17-11	The requirements of PTI are more stringent than the rule
	OAC rule 3745-17-07	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

2.a The facility shall use only water in cleanup operations, unless any other said material is included in the coating emission limits contained in Section A.1 and coating records maintained and reported as required in Sections C, D, and E.

B. Operational Restrictions

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

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

   a. the company identification for each coating and material used in the coating booth and the composition and photochemically reactive status of each material employed;

   b. the number of gallons or number of pounds of each coating and material employed, in gallons per day, or by weight in pounds per day;

   c. the organic compound content of each coating and material, in pounds per gallon or percent by weight;

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

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

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

   g. any time periods when the dry filtration system was not in service when the emissions unit was in operation.

   [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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

   a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,

   b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

   a. an identification of each day during which the average hourly organic compound emissions from all coatings and materials employed in this emissions unit exceeded 5.33 pounds per hour, and the actual average hourly organic compound emissions for each such day; and,

   b. for the days during which a photochemically reactive material was employed, an

identification of each day during which the organic compound emissions from the coatings and materials employed in this emissions unit exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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

3. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Hourly Emission Limitation for Coating Application

5.33 lbs OC/hr

Applicable Compliance Method

Compliance with the hourly OC limit shall be determined through daily recordkeeping of coating and material usage, the organic compound content of each coating and material used, hours of operation, and the summation of the calculated OC emissions from each material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and materials. Daily emissions shall be calculated by multiplying the OC content of all materials used (lbs OC/gallon of material or % OC by weight) times each coating and material's usage each day; these emissions shall be summed for all materials used. Average hourly emissions shall be calculated by dividing the total daily calculated emissions by the hours of operation. Calculations shall be documented as follows:

OC emissions/day = $\sum$ (lbs OC/gal coating) x (coating usage in gal/day) + (lbs OC/gal material) x (material usage in gal/day) +... or

OC emissions/day = $\sum$ (% OC in coating by weight) x (coating usage in lbs/day) + (% OC in material by weight) x (material usage in lbs/day) +... and

OC emissions/hr = OC emissions per day / hours of operation per day

2. Daily Emission Limitation

40.0 lbs OC/day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the daily OC limit, when using photochemically reactive materials, shall be determined through daily recordkeeping of coating and material usage, the organic compound content of each coating and material used, the photochemically reactive status of all materials, hours of operation, and the summation of the calculated OC emissions from each material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and materials. Daily emissions shall be calculated by multiplying the OC content of all materials used (lbs OC/gallon of material or % OC by weight) times each coating and material's usage each day; these emissions shall be summed, for all coatings and materials used. Calculations shall be documented as follows:

OC emissions/day = $\sum$ (lbs OC/gal coating) x (coating usage in gal/day) + (lbs OC/gal material) x (material usage in gal/day) +... or

OC emissions/day = $\sum$ (% OC in coating by weight) x (coating usage in lbs/day) + (% OC in material by weight) x (material usage in lbs/day) +...

3. Annual Emission Limitation

23.4 tons OC year

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through daily or monthly recordkeeping of coating and material usage and the organic compound content of each coating and material used. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and materials. Monthly emissions, which may be derived from daily emission calculations or re-calculated from monthly material usage records, shall be added at the end of each year, to show compliance with this limit.

4. Emission Limit for Particulate Matter

4.10 lbs PM/hr
18.0 tons PM/yr

Applicable Compliance Method

Compliance with the hourly and annual PM limit shall be determined through daily and monthly recordkeeping of coating and material usage, the PM content of any coating and material used in the emissions unit, and the operating hours per day for the emissions unit. Formulation data from each manufacture's MSDS shall be used to determine the PM content of any coating and material. Hourly and annual emissions shall be calculated by multiplying the maximum PM content of any coating

or material used in the emissions unit (61% solids), times it's density (12.2 lbs/gallon), times the coating or material's maximum usage in any hour (4.37 gallons/hr), and in any year (38,281 gal/yr). If the daily average hourly coating and material usage does not exceed 4.37 gallons per hour, the annual usage does not exceed 38,281 gallons per year, and the coatings and/or materials do not change, compliance with this limit shall be assumed, and the calculation of emissions shall be documented as follows:

PM emissions/hr = (61%PM) x (12.2 lbs/gal of coating) x (4.37 gal/hr) x (1-37%) x (1-80%) = 4.10 lbs PM/hr

Annual PM emissions (in tons/yr) = (61%PM) x (12.2 lbs/gal of coating) x (38,281 gal/year) x (1-37%) x (1-80%) x (1 ton/2000 lbs) = 17.94 tons PM/yr

If coating or material usage exceeds these amounts or a new coating or new material is used, PM emissions shall be calculated as follows:

PM emissions/hr = (% PM in coating by weight) x (lbs/gal of coating) x (coating usage in gal/hr) x (1-TE) x (1-CE) or

PM emissions/hr = (% PM in coating by weight) x (coating usage in lbs/hr) x (1-TE) x (1-CE) and

Annual PM emissions (tons/yr)= (% PM in coating by weight) x (lbs/gal of material) x (coating usage in gal/year) x (1-TE) x (1-CE) or

Annual PM emissions (tons/yr)= (% PM in coating by weight) x (coating usage in lbs/year) x (1-TE) x (1-CE)

TE= 37% transfer efficiency for spray application

CE= 80% capture efficiency for dry filter control

Any exceedance of the emission limits contained in this permit shall be reported as required in Section D.

5. <u>Emission limitation</u>

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

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

F. Miscellaneous Requirements

Air Toxic Policy

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

Pollutant: ethylene glycol

TLV: 100 mg/m^3 ceiling

Maximum Hourly Emission Rate: 1.12 lbs ethylene glycol/hr from R003

Predicted 1-Hour Maximum Ground-Level Concentration: 147.4 ug/m^3 from R003 & R004

MAGLC: 2,381 ug/m^3

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

a. changes in the composition of the materials used, 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 TLV value of 100 mg/m^3(ceiling) specified above;

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,

d. changes in the composition of the materials, or use of new materials, that would result in an increase

in emissions of any pollutant that has a listed TLV.

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

a. the change is not otherwise considered a “modification” under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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

PART II: SPECIAL TERMS AND CONDITIONS [Continued]

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Stain Line, 1 spray booth, stack S1	OAC rule 3745-31-05	Organic compound emissions shall not exceed 5.33 pounds per hour and 23.4 tons per year; and Particulate emissions shall not exceed 4.10 pounds per hour and 18.0 tons per year
	OAC rule 3745-21-07(G)(2)	Organic compound emissions shall not exceed 40 pounds in any day when using a photochemically reactive material
	OAC rule 3745-17-11	The requirements of PTI are more stringent than the rule
	OAC rule 3745-17-07	Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule

2. Additional Terms and Conditions

2.a The facility shall use only water in cleanup operations, unless any other said material is included in the coating emission limits contained in Section A.1 and coating records maintained and reported as required in Sections C, D, and E.

B. Operational Restrictions

The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

C. Monitoring and/or Recordkeeping Requirements

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

   a. the company identification for each coating and material used in the coating booth and the composition and photochemically reactive status of each material employed;

   b. the number of gallons or number of pounds of each coating and material employed, in gallons per day, or by weight in pounds per day;

   c. the organic compound content of each coating and material, in pounds per gallon or percent by weight;

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

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

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

   g. any time periods when the dry filtration system was not in service when the emissions unit was in operation.

   [Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

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

   a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,

   b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which include the following information:

   a. an identification of each day during which the average hourly organic compound emissions from all coatings and materials employed in this emissions unit exceeded 5.33 pounds per hour, and the actual average hourly organic compound emissions for each such day; and,

   b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and materials employed in this emissions unit exceeded 40 pounds per day, and the actual

organic compound emissions for each such day.

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

3. The permittee shall also submit annual reports which specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

Compliance with the emission limitations contained in this permit shall be determined in accordance with the following methods:

1. Hourly Emission Limitation for Coating Application

5.33 lbs OC/hr

Applicable Compliance Method

Compliance with the hourly OC limit shall be determined through daily recordkeeping of coating and material usage, the organic compound content of each coating and material used, hours of operation, and the summation of the calculated OC emissions from each material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and materials. Daily emissions shall be calculated by multiplying the OC content of all materials used (lbs OC/gallon of material or % OC by weight) times each coating and material's usage each day; these emissions shall be summed for all materials used. Average hourly emissions shall be calculated by dividing the total daily calculated emissions by the hours of operation. Calculations shall be documented as follows:

OC emissions/day = $\sum$ (lbs OC/gal coating) x (coating usage in gal/day) + (lbs OC/gal material) x (material usage in gal/day) +... or

OC emissions/day = $\sum$ (% OC in coating by weight) x (coating usage in lbs/day) + (% OC in material by weight) x (material usage in lbs/day) +... and

OC emissions/hr = OC emissions per day / hours of operation per day

2. Daily Emission Limitation

40.0 lbs OC/day when using photochemically reactive materials

Applicable Compliance Method

Compliance with the daily OC limit, when using photochemically reactive materials, shall be determined through daily recordkeeping of coating and material usage, the organic compound content of each coating and material used, the photochemically reactive status of all materials, hours of operation, and the summation of the calculated OC emissions from each material. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and materials. Daily emissions shall be calculated by multiplying the OC content of all materials used (lbs OC/gallon of material or % OC by weight) times each coating and material's usage each day; these emissions shall be summed, for all coatings and materials used. Calculations shall be documented as follows:

OC emissions/day = $\sum$ (lbs OC/gal coating) x (coating usage in gal/day) + (lbs OC/gal material) x (material usage in gal/day) +... or

OC emissions/day = $\sum$ (% OC in coating by weight) x (coating usage in lbs/day) + (% OC in material by weight) x (material usage in lbs/day) +...

3. Annual Emission Limitation

23.4 tons OC year

Applicable Compliance Method

Compliance with this annual OC limit shall be determined through monthly recordkeeping of coating and material usage and the organic compound content of each coating and material used. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and materials. Monthly emissions, which may be derived from daily emission calculations or re-calculated from monthly material usage records, shall be added at the end of each year, to show compliance with this limit.

4. Emission Limit for Particulate Matter

4.10 lbs PM/hr
18.0 tons PM/yr

Applicable Compliance Method

Compliance with the hourly and annual PM limit shall be determined through daily and monthly recordkeeping of coating and material usage, the PM content of any coating and material used in the emissions unit, and the operating hours per day for the unit. Formulation data from each manufacture's MSDS shall be used to determine the PM content of any coating and material. Hourly and annual emissions shall be calculated by multiplying the maximum PM content of any coating

or material used in the emissions unit (61% solids), times it's density (12.2 lbs/gallon), times the coating or material's maximum usage in any hour (4.37 gallons/hr), and in any year (38,281 gal/yr). If the daily average hourly coating and material usage does not exceed 4.37 gallons per hour and the annual usage does not exceed 38,281 gallons per year, and the coatings and/or materials do not change, compliance with this limit shall be assumed, and the calculation of emissions shall be documented as follows:

PM emissions/hr = (61%PM) x (12.2 lbs/gal of coating) x (4.37 gal/hr) x (1-37%) x (1-80%) = 4.10 lbs PM/hr

Annual PM emissions (in tons/yr) = (61%PM) x (12.2 lbs/gal of coating) x (38,281 gal/year) x (1-37%) x (1-80%) x (1 ton/2000 lbs) = 17.94 tons PM/yr

If coating usage exceeds these amounts or a new coating or new material is used, PM emissions shall be calculated as follows:

PM emissions/hr = (% PM in coating by weight) x (lbs/gal of coating) x (coating usage in gal/hr) x (1-TE) x (1-CE) or

PM emissions/hr = (% PM in coating by weight) x (coating usage in lbs/hr) x (1-TE) x (1-CE) and

Annual PM emissions (tons/yr)= (% PM in coating by weight) x (lbs/gal of material) x (coating usage in gal/year) x (1-TE) x (1-CE) or

Annual PM emissions (tons/yr)= (% PM in coating by weight) x (coating usage in lbs/year) x (1-TE) x (1-CE)

TE= 37% transfer efficiency for spray application

CE= 80% capture efficiency for dry filter control

Any exceedance of the emissions limits contained in this permit shall be reported as required in Section D.

5. <u>Emission limitation</u>

Visible particulate emissions shall not exceed twenty percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

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

F. Miscellaneous Requirements

Air Toxic Policy

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

Pollutant: ethylene glycol

TLV: 100 mg/m^3 ceiling

Maximum Hourly Emission Rate: 1.12 lbs ethylene glycol/hr from R003

Predicted 1-Hour Maximum Ground-Level Concentration: 147.4 ug/m^3 from R003 and R004

MAGLC: 2,381 ug/m^3

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the TLV value of 100 mg/m^3 (ceiling) specified above;

b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an “allowable” emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);

c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,

d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.

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

a. the change is not otherwise considered a “modification” under OAC Chapter 3745-31;

b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

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