



Mike DeWine, Governor
 Jon Husted, Lt. Governor
 Laurie A. Stevenson, Director

9/16/2019

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mr. Bill Delorm
 Accel Group, Inc.
 325 QUADRAL DRIVE
 Wadsworth, OH 44281

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1652100086
 Permit Number: P0120345
 Permit Type: Initial Installation
 County: Medina

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Robert Sprague," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
 30 East Broad Street, 4th Floor
 Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Akron Regional Air Quality Management District at (330)375-2480 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

cc: ARAQMD



Response to Comments

Facility ID:	1652100086
Facility Name:	Accel Group, Inc.
Facility Description:	Manufacturer of custom store fixtures and point of purchase displays
Facility Address:	325 QUADRAL DRIVE Wadsworth, OH 44281 Medina County
Permit:	P0120345, Permit-To-Install and Operate - Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Medina County Gazette on 07/25/2019. The comment period ended on 08/24/2019.	
Hearing date (if held)	N/A
Hearing Public Notice Date (if different from draft public notice)	N/A

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

No comments were received.



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Accel Group, Inc.**

Facility ID:	1652100086
Permit Number:	P0120345
Permit Type:	Initial Installation
Issued:	9/16/2019
Effective:	9/16/2019
Expiration:	9/16/2024



**Division of Air Pollution Control
Permit-to-Install and Operate**

for
Accel Group, Inc.

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Final Permit-to-Install and Operate
Accel Group, Inc.
Permit Number: P0120345
Facility ID: 1652100086
Effective Date: 9/16/2019

Authorization

Facility ID: 1652100086
Application Number(s): A0055316
Permit Number: P0120345
Permit Description: FEPTIO renewal with administrative modification, but processed as initial so fees can be assessed as required by ORC 3745.11. The permit will increase allowable VOC content limit for Type II adhesives that provide water resistance to the porous architectural wood materials used to make custom store fixtures and point of purchase displays and are post-formable per OAC rule 3745-21-28(C)(4) alternative limit provisions.
Permit Type: Initial Installation
Permit Fee: \$400.00
Issue Date: 9/16/2019
Effective Date: 9/16/2019
Expiration Date: 9/16/2024
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Accel Group, Inc.
325 QUADRAL DRIVE
Wadsworth, OH 44281

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
1867 West Market St.
Akron, OH 44313
(330)375-2480

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Laurie A. Stevenson
Director



Authorization (continued)

Permit Number: P0120345

Permit Description: FEPTIO renewal with administrative modification, but processed as initial so fees can be assessed as required by ORC 3745.11. The permit will increase allowable VOC content limit for Type II adhesives that provide water resistance to the porous architectural wood materials used to make custom store fixtures and point of purchase displays and are post-formable per OAC rule 3745-21-28(C)(4) alternative limit provisions.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID: K001
 Company Equipment ID: Panel Laminating Line
 Superseded Permit Number: P0107572
 General Permit Category and Type: Not Applicable

Emissions Unit ID: K004
 Company Equipment ID: Finished Parts Wiping
 Superseded Permit Number: P0107572
 General Permit Category and Type: Not Applicable

Group Name: Adhesive Booths

Emissions Unit ID:	K002
Company Equipment ID:	Adhesive Booth #1
Superseded Permit Number:	P0107572
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	K003
Company Equipment ID:	Adhesive Booth #2
Superseded Permit Number:	P0107572
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Accel Group, Inc.
Permit Number: P0120345
Facility ID: 1652100086
Effective Date: 9/16/2019

B. Facility-Wide Terms and Conditions

- ~~1. This permit document constitutes a permit to install issued in accordance with ORC 3704.03(F) and a permit to operate issued in accordance with ORC 3704.03(G).~~
 - ~~a) For the purpose of a permit to install document, the facility wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.~~
 - ~~(1) None.~~
 - ~~b) For the purpose of a permit to operate document, the facility wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.~~
 - ~~(1) B.2. through B.9.~~
- ~~2. The individual hazardous air pollutant (HAP) emissions from the entire facility (emissions units K001, K002, K003, and K004, combined) shall not exceed 9.76 tons per year, based upon the rolling, 12-month summations of the monthly emission rates.~~
- ~~3. The combined HAP emissions from the entire facility (emissions units K001, K002, K003, and K004, combined) shall not exceed 23.73 tons per year, based upon the rolling, 12 month summations of the monthly emission rates.~~
4. The volatile organic compound (VOC) emissions from the entire facility (emissions units K001, K002, K003, and K004, combined) shall not exceed 65.0 tons per year, based upon the rolling, 12-month summations of the monthly emission rates.
- ~~5. In order to demonstrate compliance with the HAP emission limitations in B.2. and B.3. above, the permittee shall collect and record the following information each month for emissions units K001, K002, K003, and K004, combined:~~
 - ~~a) The company identification of each adhesive, thinner and cleanup material employed.~~
 - ~~b) The individual HAP content, in pounds per gallon, for each HAP of each adhesive, thinner and cleanup material, as applied.~~
 - ~~c) The number of gallons of each adhesive, thinner and cleanup material employed.~~
 - ~~d) The emissions of each individual HAP, in pounds, from each adhesive, thinner and cleanup material employed [B.3.b) times B.3.c) for each individual HAP].~~
 - ~~e) The total emissions of each individual HAP, in tons, from all the adhesives, thinners and cleanup materials employed [sum of B.3.d) for each individual HAP divided by 2,000].~~
 - ~~f) The combined HAP emissions, in tons, from all the adhesives, thinners and cleanup materials employed [sum of B.3.e) for all HAPs combined divided by 2,000].~~
 - ~~g) The rolling, 12-month emissions of each individual HAP, in tons [B.3.e) for the current calendar month plus the previous 11 calendar months].~~

~~h) The rolling, 12-month emissions of combined HAPs, in tons [B.3.f) for the current calendar month plus the previous 11 calendar months].~~

6. In order to demonstrate compliance with the VOC emission limitation in B.4. above, the permittee shall collect and record the following information each month for emissions units K001, K002, K003, and K004, combined:

- a) The company identification of each adhesive, thinner and cleanup material employed.
- b) The number of gallons of each adhesive, thinner and cleanup material employed.
- c) The total VOC emissions, in tons, from all the adhesives, thinners and cleanup materials employed [(C.1.d)(2)d. for emissions unit K001 plus C.2.d)(2)d. for emissions units K002 and K003 plus C.3.d)(2)d. for emissions unit K004) divided by 2,000].
- d) The rolling, 12-month VOC emissions, in tons [B.3.c) for the current calendar month plus the previous 11 calendar months].

~~7. The permittee shall submit quarterly HAP deviation (excursion) reports that identify:~~

~~a) All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:~~

~~(1) All exceedance of the rolling, 12-month individual HAP emission limitation of 9.76 tons, for emissions units K001, K002, K003, and K004, combined.~~

~~(2) All exceedances of the rolling, 12-month combined HAP emission limitation of 23.73 tons, for emissions units K001, K002, K003, and K004, combined.~~

~~b) The probable cause of each deviation (excursion).~~

~~c) Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).~~

~~d) The magnitude and duration of each deviation (excursion).~~

~~If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.~~

~~The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate district office or local air agency).~~

8. The permittee shall submit quarterly VOC deviation (excursion) reports that identify:

a) All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any

regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

- (1) All exceedances of the rolling, 12-month VOC emission limitation of 65.0 tons, for emissions units K001, K002, K003, and K004, combined.
- b) The probable cause of each deviation (excursion).
- c) Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
- d) The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate district office or local air agency).

9. Compliance with the emissions limitations in B.2. through B.4. above shall be determined in accordance with the following method(s):

a) Emissions Limitation:

~~9.76 tons of individual HAP per rolling, 12-month summation.~~

~~Applicable Compliance Method:~~

~~Compliance with the annual allowable individual HAP emission limitation identified above shall be demonstrated based on the record keeping requirements in section B.3.~~

b) Emissions Limitation:

~~23.73 tons of combined HAPs per rolling, 12-month summation.~~

~~Applicable Compliance Method:~~

~~Compliance with the annual allowable combined HAPs emission limitation identified above shall be demonstrated based on the record keeping requirements in section B.3.~~

c) Emissions Limitation:

65.0 tons of VOC per rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation identified above shall be demonstrated based on the record keeping requirements in section B.4.



Final Permit-to-Install and Operate
Accel Group, Inc.
Permit Number: P0120345
Facility ID: 1652100086
Effective Date: 9/16/2019

C. Emissions Unit Terms and Conditions

1. **K001, Panel Laminating Line**

Operations, Property and/or Equipment Description:

Panel laminating line with reciprocating spray guns to apply contact adhesive, includes drying oven.

a) ~~This permit document constitutes a permit to install issued in accordance with ORC 3704.03(F) and a permit to operate issued in accordance with ORC 3704.03(G).~~

(1) ~~For the purpose of a permit to install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.~~

a. ~~b)(1)e.~~

(2) ~~For the purpose of a permit to operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.~~

a. ~~b)(1)b.~~

b) **Applicable Emissions Limitations and/or Control Requirements**

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 42.3 pounds per hour and 63.45 tons per year. 2.82 pounds of VOC per gallon of each thinner and cleanup material, as applied. See b)(2)a. below.
b.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V and Prevention of Significant Deterioration (PSD)]	Facility-Wide Terms and Conditions B.2. through B.9. See c)(1) below.
c.	OAC rule 3745-21-28(C)(1)	2.1 pounds of VOC per gallon of adhesive, excluding water and exempt solvents, as applied. See b)(2)b., b)(2)c. and c)(2) below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-21-28(C)(4)	4.98 pounds of VOC per gallon, excluding water and exempt solvents, as applied, for Type II adhesives that provide water resistance to the porous architectural wood materials used to make custom store fixtures and point of purchase displays and are post-formable. See b)(2)b. through b)(2)d. and c)(2) below.
e.	OAC rule 3745-114-01	See d)(4) through d)(6) below.

(2) Additional Terms and Conditions

- a. The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) include compliance with OAC rule 3745-21-28.
- ~~b. The permittee shall implement the following work practice standards:~~
 - ~~i. Store all VOC containing adhesives, adhesive primers, and process-related waste materials in closed containers.~~
 - ~~ii. Store all VOC containing cleaning materials and used shop towels in closed containers.~~
 - ~~iii. Ensure that mixing and storage containers used for VOC-containing cleaning materials, adhesives, adhesive primers, and process-related waste materials are kept closed at all times except when depositing or removing these materials.~~
 - ~~iv. Minimize spills of VOC-containing cleaning materials, adhesives, adhesive primers, and process-related waste materials.~~
 - ~~v. Convey VOC-containing cleaning materials, adhesives, adhesive primers, and process-related waste materials from one location to another in closed containers or pipes.~~
 - ~~vi. Minimize VOC emission from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.~~
- ~~c. The allowable VOC emission limitation established under OAC rule 3745-21-28(C)(1) shall not apply to any adhesive that is subject to OAC rule 3745-21-28(C)(4).~~

- d. ~~The alternative VOC emission limitation and associated monitoring, record keeping and reporting requirements apply once U.S. EPA approves OAC paragraph 3745-21-28(C)(4) as part of the Ohio State Implementation Plan (SIP).~~

e) ~~Operational Restrictions~~

- (1) ~~The maximum annual adhesive usage for emissions unit K001 shall not exceed 45,000 gallons, based upon a rolling, 12-month summation of the adhesive usage.~~
- (2) ~~All adhesives, sealants, adhesive primers or sealant primers shall be applied using one of the following application methods: electrostatic spray, HVLP spray, flow coat, roll coat, dip coat (including electrodeposition), airless spray, or air-assisted airless spray. An equivalent coating application method capable of achieving similar transfer efficiencies to HVLP may be approved by the director on a case-by-case basis.~~

d) Monitoring and/or Recordkeeping Requirements

- (1) ~~The permittee shall maintain Safety Data Sheets (SDS) for each adhesive, thinner, and cleanup material employed in this emissions unit.~~
- (2) The permittee shall maintain records, on a monthly basis, of the following information for this emissions unit:
- The name and identification number of each adhesive, thinner, and cleanup material employed.
 - The number of gallons of each adhesive, thinner, and cleanup material employed.
 - The VOC content, in pounds of VOC per gallon, of each adhesive, thinner, and cleanup material employed.
 - The calculated VOC emissions, in pounds, from all the adhesives, thinners, and cleanup materials employed [$\sum(b \times c)$ for all adhesives + $\sum(b \times c)$ for all thinners + $\sum(b \times c)$ for all cleanup materials].
 - The number of hours the emissions unit was in operation.
 - The average hourly VOC emission rate, in pounds per hour [$d \div e$].
 - The total adhesive usage rate, in gallons [$\sum(b)$ for all adhesives].
 - The rolling, 12-month adhesive usage rate, in gallons [g for the current calendar month plus the previous 11 calendar months].
- (3) The permittee shall maintain records demonstrating compliance with OAC rule 3745-21-28 including, but not limited to, the following information:
- A list of each adhesive, sealant, adhesive primer, and sealant primer in use and in storage.

- b. A data sheet or material list which provides the material name, manufacturer identification, and material application.
- c. Catalysts, reducers or other components used and the mix ratio.
- d. The VOC content of each product as supplied.
- e. The final VOC content as applied.
- f. The monthly volume of each adhesive, sealant, adhesive primer, and sealant primer used.

All records made to determine compliance with this rule shall be maintained for 5 years from the date such record is created and shall be made available to the director or any authorized representative of the director within 90 days of a request.

- ~~(4) The permit to install and operate (PTIO) for this emissions unit, K001, 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 PTIO 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 application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1 hour maximum ground level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):~~

~~Pollutant: Isopropyl alcohol~~

~~TLV (mg/m³): 491.3~~

~~Maximum Hourly Emission Rate (lbs/hr): 50~~

~~Predicted 1 Hour Maximum Ground Level Concentration (ug/m³): 3,934~~

~~MAGLC (ug/m³): 11,698~~

- ~~(5) 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.~~
- ~~c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).~~

~~If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the changes to be a "modification" under OAC rule 3745-31-01, and a modification of the existing PTIO will not be required. If the changes are defined as a modification, then the permittee shall obtain a final PTIO prior to the change.~~

- ~~(6) 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".~~
 - ~~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.~~

e) Reporting Requirements

- ~~(1) The permittee shall notify the Director (the appropriate district office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate district office or local air agency) within 30 days following the end of the calendar month.~~
- ~~(2) The permittee shall submit quarterly deviation (excursion) reports that identify:~~
 - ~~a. All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:~~
 - ~~i. All exceedances of the rolling, 12-month adhesive usage limitation of 45,000 gallons.~~
 - ~~ii. All exceedances of the VOC content limitation of 2.82 pounds of VOC per gallon of each thinner and cleanup material, as applied.~~
 - ~~iii. All exceedances of the VOC content limitation of 2.1 pounds of VOC per gallon of adhesive, excluding water and exempt solvents, as applied.~~



- ~~b. The probable cause of each deviation (excursion).~~
- ~~e. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).~~
- ~~d. The magnitude and duration of each deviation (excursion).~~

~~If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.~~

~~The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate district office or local air agency).~~

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. All exceedances of the VOC content limitation of 4.98 pounds of VOC per gallon, excluding water and exempt solvents, as applied, for Type II adhesives that provide water resistance to the porous architectural wood materials used to make custom store fixtures and point of purchase displays and are post-formable.
 - b. The probable cause of each deviation (excursion).
 - c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
 - d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate district office or local air agency).

- ~~(4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.~~

~~(5) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the district office or local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.~~

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

~~42.3 pounds of VOC per hour and 63.45 tons of VOC per year.~~

Applicable Compliance Method:

~~Compliance with the hourly allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements in section d)(2).~~

~~Compliance with the annual allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements in section d)(2), and shall be the summation of the 12 monthly VOC emission rates for the calendar year, divided by 2,000 pounds per ton.~~

b. Emission Limitation:

~~2.82 pounds of VOC per gallon or each thinner and cleanup material, as applied.~~

Applicable Compliance Method:

~~Compliance with the VOC content limitation above shall be based upon the record keeping requirements in section d)(2). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives, thinners, and cleanup materials.~~

c. Emission Limitation:

~~2.1 pounds of VOC per gallon of adhesive, excluding water and exempt solvents, as applied.~~



Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements in section d)(3). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives, thinners, and cleanup materials.

d. Emission Limitation:

~~4.98 pounds of VOC per gallon, excluding water and exempt solvents, as applied, for Type II adhesives that provide water resistance to the porous architectural wood materials used to make custom store fixtures and point of purchase displays and are post-formable.~~

Applicable Compliance Method:

~~Compliance with the VOC content limitations above shall be based upon the record keeping requirements in section d)(3). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives, thinners, and cleanup materials.~~

g) Miscellaneous Requirements

(1) ~~None.~~

2. Emissions Unit Group – Adhesive Booths: K002, K003

EU ID	Operations, Property and/or Equipment Description
K002	Adhesive Booth # 1 - Hand Spray Contact Adhesive
K003	Adhesive Booth # 2 - Hand Spray Contact Adhesive

a) ~~This permit document constitutes a permit to install issued in accordance with ORC 3704.03(F) and a permit to operate issued in accordance with ORC 3704.03(G).~~

(1) ~~For the purpose of a permit to install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.~~

a. ~~b)(1)e.~~

(2) ~~For the purpose of a permit to operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.~~

a. ~~b)(1)b.~~

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	 Volatile organic compound (VOC) emissions from each emissions unit shall not exceed 3.96 pounds per hour and 6.19 tons per year. Hexane emissions from each emissions unit shall not exceed 3.12 pounds per hour and 4.88 tons per year. Toluene emissions from each emissions unit shall not exceed 0.72 pound per hour and 1.13 tons per year. 3.3 pounds of VOC per gallon of each thinner and cleanup material, as applied. See b)(2)a. below.
b.	OAC rule 3745-31-05(D) [Synthetic Minor to avoid Title V	Facility Wide Terms and Conditions B.2. through B.9.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	and Prevention of Significant Deterioration (PSD)]	See c)(1) and c)(2) below.
g.	OAC rule 3745-21-28(C)(1)	2.1 pounds of VOC per gallon of adhesive, excluding water and exempt solvents, as applied. See b)(2)b., b)(2)c. and c)(3) below.
d.	OAC rule 3745-21-28(C)(4)	4.98 pounds of VOC per gallon, excluding water and exempt solvents, as applied, for Type II adhesives that provide water resistance to the porous architectural wood materials used to make custom store fixtures and point of purchase displays and are post-formable. See b)(2)b. through b)(2)d. and c)(3) below.
e.	OAC rule 3745-114-01	See d)(4) through d)(6) below.

(2) Additional Terms and Conditions

- a. The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) include compliance with OAC rule 3745-21-28.
- ~~b. The permittee shall implement the following work practice standards:~~
 - ~~i. Store all VOC containing adhesives, adhesive primers, and process-related waste materials in closed containers.~~
 - ~~ii. Store all VOC containing cleaning materials and used shop towels in closed containers.~~
 - ~~iii. Ensure that mixing and storage containers used for VOC containing cleaning materials, adhesives, adhesive primers, and process-related waste materials are kept closed at all times except when depositing or removing these materials.~~
 - ~~iv. Minimize spills of VOC containing cleaning materials, adhesives, adhesive primers, and process-related waste materials.~~
 - ~~v. Convey VOC containing cleaning materials, adhesives, adhesive primers, and process-related waste materials from one location to another in closed containers or pipes.~~
 - ~~vi. Minimize VOC emission from cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed~~

~~without atomizing the cleaning solvent and all spent solvent is captured in closed containers.~~

- ~~c. The allowable VOC emission limitation established under OAC rule 3745-21-28(C)(1) shall not apply to any adhesive that is subject to OAC rule 3745-21-28(C)(4).~~
- ~~d. The alternative VOC emission limitation and associated monitoring, record keeping and reporting requirements apply once U.S. EPA approves OAC paragraph 3745-21-28(C)(4) as part of the Ohio State Implementation Plan (SIP).~~

e) ~~Operational Restrictions~~

- ~~(1) The maximum annual adhesive usage for emissions unit K002 shall not exceed 3,750 gallons, based upon a rolling, 12-month summation of the adhesive usage.~~
- ~~(2) The maximum annual adhesive usage for emissions unit K003 shall not exceed 3,750 gallons, based upon a rolling, 12-month summation of the adhesive usage.~~
- ~~(3) All adhesives, sealants, adhesive primers or sealant primers shall be applied using one of the following application methods: electrostatic spray, HVLP spray, flow coat, roll coat, dip coat (including electrodeposition), airless spray, or air-assisted airless spray. An equivalent coating application method capable of achieving similar transfer efficiencies to HVLP may be approved by the director on a case-by-case basis.~~

d) Monitoring and/or Recordkeeping Requirements

- ~~(1) The permittee shall maintain Safety Data Sheets (SDS) for each adhesive, thinner, and cleanup material employed in these emissions units.~~
- (2) The permittee shall maintain records, on a monthly basis, of the following information for each emissions unit, separately:
 - a. The name and identification number of each adhesive, thinner, and cleanup material employed.
 - b. The number of gallons of each adhesive, thinner, and cleanup material employed.
 - c. The VOC content, in pounds of VOC per gallon, the hexane content, in pounds of hexane per gallon, and the toluene content, in pounds of toluene per gallon, of each adhesive, thinner, and cleanup material employed.
 - d. The calculated VOC emissions, in pounds, from all the adhesives, thinners, and cleanup materials employed [$\sum(b \times c)$ for all adhesives + $\sum(b \times c)$ for all thinners + $\sum(b \times c)$ for all cleanup materials].
 - e. The calculated hexane emissions, in pounds, from all the adhesives, thinners, and cleanup materials employed [$\sum(b \times c)$ for all adhesives + $\sum(b \times c)$ for all thinners + $\sum(b \times c)$ for all cleanup materials].

- f. The calculated toluene emissions, in pounds, from all the adhesives, thinners, and cleanup materials employed [$\sum(b \times c)$ for all adhesives + $\sum(b \times c)$ for all thinners + $\sum(b \times c)$ for all cleanup materials].
 - g. The number of hours the emissions unit was in operation.
 - h. The average hourly VOC emission rate, in pounds per hour [d+g].
 - i. The average hourly hexane emission rate, in pounds per hour [e+g].
 - j. The average hourly toluene emission rate, in pounds per hour [f+g].
 - k. The total adhesive usage rate, in gallons [$\sum(b)$ for all adhesives].
 - l. The rolling, 12-month adhesive usage rate, in gallons [k for the current calendar month plus the previous 11 calendar months].
- (3) The permittee shall maintain records demonstrating compliance with OAC rule 3745-21-28 including, but not limited to, the following information:
- a. A list of each adhesive, sealant, adhesive primer, and sealant primer in use and in storage.
 - b. A data sheet or material list which provides the material name, manufacturer identification, and material application.
 - c. Catalysts, reducers or other components used and the mix ratio.
 - d. The VOC content of each product as supplied.
 - e. The final VOC content as applied.
 - f. The monthly volume of each adhesive, sealant, adhesive primer, and sealant primer used.

All records made to determine compliance with this rule shall be maintained for 5 years from the date such record is created and shall be made available to the director or any authorized representative of the director within 90 days of a request.

- (4) ~~The permit to install and operate (PTIO) for these emissions units, K002 and K003, 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 PTIO application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by these emissions units using data from the application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1 hour maximum ground level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):~~

~~Pollutant: Hexane~~

~~TLV (mg/m³): 176.2~~

~~Maximum Hourly Emission Rate (lbs/hr): 25~~

~~Predicted 1 Hour Maximum Ground-Level Concentration (ug/m³): 3,456~~

~~MAGLC (ug/m³): 4,195~~

- (5) ~~Physical changes to or changes in the method of operation of either 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.~~
- ~~c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).~~

~~If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the changes to be a "modification" under OAC rule 3745-31-01, and a modification of the existing PTIO will not be required. If the changes are defined as a modification, then the permittee shall obtain a final PTIO prior to the change.~~

- (6) ~~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".~~
- ~~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.~~

e) Reporting Requirements

~~(1) The permittee shall notify the Director (the appropriate district office or local air agency) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate district office or local air agency) within 30 days following the end of the calendar month.~~

~~(2) The permittee shall submit quarterly deviation (excursion) reports that identify:~~

~~a. All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:~~

~~i. All exceedances of the rolling, 12-month adhesive usage limitation of 3,750 gallons for emissions unit K002 and/or emissions unit K003.~~

~~ii. All exceedances of the VOC content limitation of 3.3 pounds of VOC per gallon of each thinner and cleanup material, as applied.~~

~~iii. All exceedances of the VOC content limitation of 2.1 pounds of VOC per gallon of adhesive, excluding water and exempt solvents, as applied.~~

~~b. The probable cause of each deviation (excursion).~~

~~c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).~~

~~d. The magnitude and duration of each deviation (excursion).~~

~~If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.~~

~~The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate district office or local air agency).~~

(3) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. All exceedances of the VOC content limitation of 4.98 pounds of VOC per gallon, excluding water and exempt solvents, as applied, for Type II adhesives that provide water resistance to the porous architectural wood

materials used to make custom store fixtures and point of purchase displays and are post-formable.

- b. The probable cause of each deviation (excursion).
- c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
- d. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate district office or local air agency).

~~(4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.~~

~~(5) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the district office or local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.~~

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

~~3.96 pounds of VOC per hour and 6.19 tons of VOC per year.~~

~~Applicable Compliance Method:~~

~~Compliance with the hourly allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements in section d)(2).~~

~~Compliance with the annual allowable VOC emission limitation above shall be demonstrated based on the record keeping requirements in section d)(2), and shall be the summation of the 12 monthly VOC emission rates for the calendar year, divided by 2,000 pounds per ton.~~

b. ~~Emission Limitation:~~

~~3.12 pounds of hexane per hour and 4.88 tons of hexane per year.~~

~~Applicable Compliance Method:~~

~~Compliance with the hourly allowable hexane emission limitation above shall be demonstrated based on the record keeping requirements in section d)(2).~~

~~Compliance with the annual allowable hexane emission limitation above shall be demonstrated based on the record keeping requirements in section d)(2), and shall be the summation of the 12 monthly hexane emission rates for the calendar year, divided by 2,000 pounds per ton.~~

c. ~~Emission Limitation:~~

~~0.72 pound of toluene per hour and 1.13 tons of toluene per year.~~

~~Applicable Compliance Method:~~

~~Compliance with the hourly allowable toluene emission limitation above shall be demonstrated based on the record keeping requirements in section d)(2).~~

~~Compliance with the annual allowable toluene emission limitation above shall be demonstrated based on the record keeping requirements in section d)(2), and shall be the summation of the 12 monthly toluene emission rates for the calendar year, divided by 2,000 pounds per ton.~~

d. ~~Emission Limitation:~~

~~3.3 pounds of VOC per gallon of each thinner and cleanup material, as applied.~~

~~Applicable Compliance Method:~~

~~Compliance with the VOC content limitation above shall be based upon the record keeping requirements in section d)(2). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives, thinners, and cleanup materials.~~

e. Emission Limitation:

2.1 pounds of VOC per gallon of adhesive, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

Compliance with the VOC content limitation above shall be based upon the record keeping requirements in section d)(3). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives, thinners, and cleanup materials.

f. ~~Emission Limitation:~~

~~4.98 pounds of VOC per gallon, excluding water and exempt solvents, as applied, for Type II adhesives that provide water resistance to the porous architectural wood materials used to make custom store fixtures and point of purchase displays and are post-formable.~~

~~Applicable Compliance Method:~~

~~Compliance with the VOC content limitation above shall be based upon the record keeping requirements in section d)(3). Formulation data or U.S. EPA Method 24 shall be used to determine the VOC content of the adhesives, thinners, and cleanup materials.~~

g) ~~Miscellaneous Requirements~~

(1) ~~None.~~