OhioEPA

State of Ohio Environmental Protection Agency

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122 S. Front Street
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Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

02/06/02

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

03-86-00-0042
Sauder Manufacturing Co. / Stryker Plant
Nathan Baer
Sauder Manfacturing Co. - Stryker Plant
201 Horton Street
Stryker, OH 43557

Dear Nathan Baer:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northwest District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions or comments concerning this draft Title V permit, please contact Northwest District Office.

Very truly yours,

Thomas G. Rigo

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

cc: USEPA (electronically submitted)
File, DAPC PMU
Northwest District Office
Indiana
Michigan

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 02/06/02	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 03-86-00-0042 to:

Sauder Manufacturing Co. / Stryker Plant
201 Horton Street
Stryker, OH 43557

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

R001 (Sealer Spray booth)
Dedicated sealer application.

R002 (Topcoat Spray booth)
Dedicated topcoat application

R003 (Stain Booth #1)
Dedicated stain application

R005 (Foam Adhesive Booth)
Adhesive is applied to foam and fabric in this booth. The adhesive is used to attach upholstry to the furniture.

R006 (Stain Booth #2)
Dedicated stain application

R007 (Stain Booth #3)
Dedicated stain application

R008 (Stain Booth #4)
Dedicated stain application

Z006 (Laminating and Plybending)
Laminated materials are attached to furniture with glue.

Z007 (Woodworking and Wood Waste Handling)
Wood milling and sanding operations are performed in this area. Also, wood waste from the milling and sanding operations is conveyed, ground, and loaded out in this area.

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419) 352-8461

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b. 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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written 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.) See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

2. 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, i.e., upset condition, of any emissions unit(s) 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upset conditions.

Except as provided in OAC rule 3745-15-06, 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).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.
(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. 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.
(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based

on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

   i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
   ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
   iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
   iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

   i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
   ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

   i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
   ii. Compliance certifications shall include the following:
      (a) An identification of each term or condition of this permit that is the basis of the certification.
      (b) The permittee's current compliance status.
      (c) Whether compliance was continuous or intermittent.
      (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.

(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.
(Authority for term: OAC rule 3745-77-07(A)(1))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping 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 record keeping 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.)

2. 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.

3. 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.

4. 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).

5. 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.

6. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. This facility shall comply with all applicable requirements of 40 CFR part 63, subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operation) as well as with all the applicable requirements of subpart A of 40 CFR part 63 (General Provisions), as identified in Table I of subpart JJ.

2. Work Practice Standards:

2.a. Work Practice Implementation Plan:

The permittee shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in sections A.2.b through A.2.l, which are based on paragraphs (b) through (l) of 40 CFR 63.803. The written work practice implementation plan shall be developed no more than 60 days after December 7, 1998 and shall be available for inspection by the Director or the Ohio EPA Northwest District Office upon request. If the Director or the Ohio EPA Northwest District Office determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (b) through (l) of section A.2. or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Director or the Ohio EPA Northwest District Office may require this facility to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.

2.b. Operator Training Course:

The permittee shall train all new and existing employees, including contract personnel, who are involved in finishing, gluing, cleaning, washoff operations, use of manufacturing equipment, or implementation of the requirements of subpart JJ. All new personnel, those hired after 12/7/98, shall be trained upon hiring. All existing personnel, those hired before 12/7/98, shall be trained within six months of 12/7/98. All personnel shall be given refresher training annually. The permittee shall maintain a copy of the training program with the work practice implementation plan.

The training program shall include, at a minimum, the following:

i. A list of all current personnel by name and job description that are required to be trained;

ii. An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;

iii. Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and

iv. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.

A. State and Federally Enforcable Section (continued)

2.c. Inspection and Maintenance Plan:

The permittee shall prepare, and maintain with the work practice implementation plan, a written leak inspection and maintenance plan that specifies the following:

i. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;

ii. An inspection schedule;

iii. Methods for documenting the date and results of each inspection and any repairs that were made;

iv. The time frame between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

(a) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than (5) five calendar days after the leak is detected; and

(b) Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within (3) three months.

2.d. Cleaning and Washoff Solvent Accounting System:

The permittee shall develop an organic HAP solvent accounting form to record the following:

i. The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in 63.801 of subpart JJ;

ii. The number of pieces washed off, and the reason for the washoff; and

iii. The quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

2.e. Chemical Composition of Cleaning and Washoff Solvents:

The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of 40 CFR Part 63, subpart JJ in concentrations subject to MSDS reporting as required by OSHA.

2.f. Spray Booth Cleaning:

The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the permittee shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.

2.g. Storage Requirements:

The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

A. State and Federally Enforcable Section (continued)

2.h. Application Equipment Requirements:

The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:

i. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;

ii. For touchup and repair under the following conditions:

(a) The touchup and repair occurs after completion of the finishing operations; or

(b) The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.

iii. When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;

iv. When emissions from the finishing application station are directed to a control device;

v. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or

vi. The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic infeasibility by submitting to the Ohio EPA Northwest District Office a videotape, a technical report, or other documentation that supports the permittee's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the permittee's claim of technical or economic infeasibility:

(a) The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or

(b) The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

2.i. Line Cleaning:

The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.

2.j. Gun Cleaning:

The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container.

2.k. Washoff Operations:

The permittee shall control emissions from washoff operations by:

i. Using normally closed tanks for washoff; and

ii. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

A. State and Federally Enforcable Section (continued)

2.l. Formulation Assessment Plan for Finishing Operations:

The permittee shall prepare, and maintain with the work practice implementation plan a formulation assessment plan that:

i. Identifies VHAP from the list presented in Table 5 of 40 CFR Part 63, subpart JJ that are being used in finishing operations at this facility.

ii. Establishes a baseline level of usage by the affected source for each VHAP identified in section A.2.l.i. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in section A.2.l.i. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined by using the equation in 63.805(d) or (e).

iii. Tracks the annual usage of each VHAP identified in section A.2.l.i by the permittee that is present in amounts subject to MSDS reporting as required by OSHA.

iv. If, after November 1998, the annual usage of the VHAP identified in section A.2.l.i exceeds its baseline level, then the permittee shall provide written notification to the Ohio EPA Northwest District Office that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the permittee from further action, unless the affected facility operation is not in compliance with any State regulations or requirements for that VHAP:

(a) The exceedance is no more than 15.0 percent above the baseline;

(b) Usage of the VHAP is below the de minimis level presented in Table 5 of subpart JJ for that VHAP;

(c) This facility is in compliance with its State's air toxic regulations or guidelines for the VHAP; or

(d) The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.

v. If none of the above explanations are the reason for the increase, the permittee shall confer with the Ohio EPA District Office to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations or other criteria mutually agreed upon by the Ohio EPA Northwest District Office and permittee. If there are no practical and reasonable solutions, the permittee needs to take no further action. If there are solutions, the permittee shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

vi. If after November 1998, the facility uses a VHAP of potential concern for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level, based on 70 year exposure levels and data provided in the proposed rulemaking pursuant to Section 112(g) of the CAA, for that pollutant. A list of VHAP of potential concern is provided in Table 6 of subpart JJ.

If usage of the VHAP of potential concern exceeds the de minimis level, then the permittee shall provide an explanation to the Ohio EPA Northwest District Office that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in paragraph A.2.l.iv., then the permittee shall follow the procedures established in section A.2.l.v.

3. Recordkeeping Requirements:

3.a. The permittee shall fulfill all recordkeeping requirements of 40 CFR 63.10 of subpart A, according to the applicability criteria in section A.1.

A. State and Federally Enforcable Section (continued)

3.b. The permittee shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:

i. Records demonstrating that the operator training program required by section A.2.b. is in place;

ii. Records collected in accordance with the inspection and maintenance plan required by section A.2.c.;

iii. Records associated with the cleaning solvent accounting system required by section A.2.d.;

iv. Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by section A.2.h.v.;

v. Records associated with the formulation assessment plan required by section A.2.l.; and

vi. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

3.c. The permittee shall maintain records of all other information submitted with the written notifications required by section A.4.b. and the semiannual reports required by section A.4.c.

3.d. As specified under 40 CFR 63.10(b)(1), the permittee shall maintain files of all information (including all reports and notifications) recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

4. Reporting Requirements:

4.a. The permittee shall fulfill all reporting requirements of 40 CFR 63.7 through 63.10 of subpart A (General Provisions) according to the applicability criteria in section A.1.

4.b. For any written notification required under section A.2.l.iv., the permittee shall include one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

4.c. The permittee shall submit semiannually a compliance certification on the work practice implementation plan. The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation. The semiannual compliance certifications shall be submitted within 30 days after each six-month period to the Ohio EPA Northwest District Office. The six-month periods are January through June and July through December.

B. State Only Enforceable Section

1. Z008 - air makeup unit #01
Z009 - air makeup unit #02
Z010 - air makeup unit #03
Z011 - air makeup unit #04
Z012 - drying oven

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Sealer Spray booth (R001)

Activity Description: Dedicated sealer application.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
sealer spray booth w/ high volume low pressure (HVLP) guns for wood furniture	OAC rule 3745-31-05 (PTI #03-11296, issued 7/29/98)	23.2 lbs organic compound (OC)/hr and 101.6 TPY OC from coatings (See A.I.2.a.) 104.6 lbs OC/month and 0.63 TPY OC from cleanup materials 129.6 TPY OC (See A.I.2.b. for this combined limit.) VOC (See A.I.2.c.) 0.62 lb particulate emissions (PE)/hr and 2.72 TPY PE visible particulate emissions (See A.I.2.d.) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR 60, Subpart JJ.
	OAC rule 3745-21-07(G)(2)	none (See A.II.1.)
	OAC rule 3745-17-11(B)(2)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR 63.802(a)(1)	Emission limitations on volatile hazardous air pollutants (VHAP): - Sealer: 1.0 lb VHAP/lb solids, as applied - Thinner: 10.0% VHAP by weight (each thinner)

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR 63.803	Prepare and maintain a work practice implementation plan (see section A.2.a. in Part II).

2. Additional Terms and Conditions

2.a The hourly and annual OC limitations for coatings were established for Permit to Install (PTI) purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping and reporting requirements are necessary to ensure compliance with these limitations.

2.b This is a combined limit established to avoid PSD review for VOC emissions resulting from a modification which increased the potential emissions. The modification is contained in PTI #03-11296, and the combined limit is enforced as a rolling 12-month summation of the OC input rates from coating and cleanup material usage for combined emissions units R001, R002, R003, R006, R007, and R008. All OC input rates are considered to be OC emission rates.

2.c For purposes of federal enforceability, all OCs are considered to be VOCs.

2.d Visible particulate emissions from any stack shall not exceed twenty per cent opacity as a six-minute average, except for not more than six consecutive minutes in any sixty minutes, and shall not exceed sixty per cent opacity, as a six-minute average, at any time.

II. Operational Restrictions

1. The permittee shall not employ any coating and/or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

3. The permittee shall only use coating materials in this emissions unit that comply with the applicable VHAP emission limitation in section A.I.1. on an "as applied" basis.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:

1.a For coating material usage in this emissions unit:

i. The company identification for each coating material employed.

ii. The determination of whether or not the coating material is a photochemically reactive material.

iii. The number of gallons of each coating material employed.

iv. The OC content of each coating material, in pounds/gallon.

v. The OC input rate for each coating material, in pounds/month [(A.III.1.a.iii.) x (A.III.1.a.iv.)].

vi. The total OC input rate for all coating materials, in pounds/month [summation of (A.III.1.a.v.)].

III. Monitoring and/or Record Keeping Requirements (continued)

1.b For cleanup material* usage in this emissions unit:

i. The company identification for each cleanup material employed.

ii. The determination of whether or not the cleanup material is a photochemically reactive material.

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

iv. The OC content of each cleanup material, in pounds/gallon.

v. The OC input rate for each cleanup material, in pounds/month [(A.III.1.b.iii.) x (A.III.1.b.iv.)].

vi. The total OC input rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.v.)].

vii. The total OC emission rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.v.)]. Note: The total OC emission rate for all cleanup materials is presumed to be the same as total OC input rate for all cleanup materials.

viii. The cumulative total OC emissions for the calendar year for all cleanup materials, in tons [summation of (A.III.1.b.vii.) for all months in the current calendar year, divided by 2000].

*Note: The permittee is only required to maintain records for cleanup materials that result in the emissions of OC.

1.c For coating and cleanup material usage in combined emissions units R001, R002, R003, R006, R007, and R008:

i. The total OC input rate for all coating materials, in pounds/month [summation of (A.III.1.a.vi) for the combined emission units].

ii. The total OC input rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.vi) for the combined emission units].

iii. The total OC input rate for all coating and cleanup materials, in pounds/month [(A.III.1.c.i) + (A.III.1.c.ii)].

iv. The total OC input rate for all coating and cleanup materials, in tons/rolling 12-month period [summation of (A.III.1.c.iii) for the current calendar month and the preceding 11 calendar months, divided by 2000].

2. In order to demonstrate compliance with the VHAP limits specified in section A.I.1., the permittee shall maintain records of the following information:

a. a certified product data sheet for each sealer and thinner;

b. the VHAP content, in lbs VHAP/lb solids, as applied, of each sealer; and

c. the VHAP content, in percent HAP by weight, of each thinner.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each of the following:

a. Each month during which the total OC input rate, in tons/rolling 12-month period for combined emission units R001, R002, R003, R006, R007, and R008, exceeded 129.6 TPY OC, and the recorded total OC input rate for each such month.

b. Each month during which the monthly or annual OC emissions from cleanup materials exceeded the respective monthly or annual OC emissions limit for cleanup materials specified in section A.I.1., and the actual OC emissions for each such exceedance.

c. Each day during which a coating or cleanup material classified as a photochemically reactive material was employed, and a copy of the documentation for each such photochemically reactive material.

d. Each day during which the dry filtration system did not operate when the emissions unit was in operation, and a copy of the record for each such day.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c. of the Part I - General Terms and Conditions of this permit.

2. Regarding the VHAP emission limitations in section A.I.1., the permittee shall submit semiannual compliance certification reports which state that compliant coating materials have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The emissions unit is in violation of the applicable VHAP emissions limit whenever a noncompliant coating material, as demonstrated by records or by a sample of the coating material, is used. If the emissions unit was in noncompliance, the permittee shall state the measures that were taken to bring the emissions unit into compliance.

The semiannual compliance certification reports shall be submitted within 30 days after each six-month period to the Ohio EPA Northwest District Office. The six-month periods are January through June and July through December.

V. Testing Requirements

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

1.a Emission Limitation:
23.2 lbs organic compound (OC)/hr and 101.6 TPY OC from coatings

Applicable Compliance Method:
The hourly and annual OC emission limitations are based on the emissions unit's potential to emit.* Therefore, no hourly or monthly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

*The potential to emit for this emissions unit was based on a maximum OC content of 5.53 lbs OC/gal and a maximum application rate of 4.20 gals/hr.

The tons/yr limitation was developed by multiplying the lbs/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

1.b Emission Limitation:
104.6 lbs OC/month and 0.63 TPY OC from cleanup materials

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit.

V. Testing Requirements (continued)

1.c Emission Limitation:
129.6 TPY OC (tons OC/rolling 12-month period; total OC input rate for combined emissions units R001, R002, R003, R006, R007, and R008)

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in section A.III.1. of the terms and conditions of this permit.

1.d Emission Limitation:
0.62 lb PE/hr and 2.72 TPY PE

Applicable Compliance Method:
The permittee may calculate actual PE rates for this emissions unit by utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = Particulate emissions rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

The tons/yr limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

If required, compliance with the PE limitation shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(10).

1.e Emission Limitation:
Sealer: 1.0 lb VHAP/lb solids, as applied
Thinner: 10.0% VHAP by weight (each thinner)

Applicable Compliance Method:
The permittee shall demonstrate compliance with each VHAP emissions limit by means of the record keeping in section A.III.2. and the procedures in sections A.V.2. and A.V.3.

1.f Emission Limitation:
Visible particulate emissions from any stack shall not exceed twenty per cent opacity as a six-minute average, except for not more than six consecutive minutes in any sixty minutes, and shall not exceed sixty per cent opacity, as a six-minute average, at any time.

Applicable Compliance Method:
If required, the method to be employed to demonstrate compliance with the visible PE limitation shall be OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating or solvent shall be determined in accordance with the following:

a. EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. Method 311 shall then be used to quantify those VHAP identified through formulation data. Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during cure. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. EPA Method 24 (40 CFR part 60, appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Ohio EPA that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. In the event of any inconsistency between Method 24 or Method 311 test data and a facility's formulation data, that is, if the Method 24/311 value is higher, the Method 24/311 test shall govern unless after consultation, the permittee could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA- 340/1-91-010.

b. The permittee may request approval from the USEPA Administrator to use an alternative method for determining the VHAP content of the coating.

3. Certified product data sheet (CPDS) means documentation furnished by coating or adhesive suppliers or an outside laboratory that provides:

a. The VHAP content of a finishing material, contact adhesive, or solvent, by percent weight, measured using the EPA Method 311, or an equivalent or alternative method (or formulation data if the coating meets the criteria specified in section A.V.2.a.);

b. The solids content of a finishing material or contact adhesive by percent weight, determined using data from the EPA Method 24, or an alternative or equivalent method (or formulation data if the coating meets the criteria specified in section A.V.2.a.); and

c. The density, measured by EPA Method 24 or an alternative or equivalent method.

Therefore, the reportable VHAP content shall represent the maximum aggregate emissions potential of the finishing material, adhesive, or solvent in concentrations greater than or equal to 1.0 percent by weight or 0.1 percent for VHAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), as formulated. Only VHAP present in concentrations greater than or equal to 1.0 percent by weight, or 0.1 percent for VHAP that are carcinogens, must be reported on the CPDS. The purpose of the CPDS is to assist the permittee in demonstrating compliance with the emission limitations on volatile hazardous air pollutants.

Note: Because the optimum analytical conditions under EPA Method 311 vary by coating, the coating or adhesive supplier may also choose to include on the CPDS the optimum analytical conditions for analysis of the coating, adhesive, or solvent using EPA Method 311. Such information may include, but not be limited to, separation column, oven temperature, carrier gas, injection port temperature, extraction solvent, and internal standard.

4. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Topcoat Spray booth (R002)

Activity Description: Dedicated topcoat application

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
topcoat spray booth w/ high volume low pressure (HVLP) guns for wood furniture	OAC rule 3745-31-05 (PTI #03-11296, issued 7/29/98)	20.1 lbs organic compound (OC)/hr and 88.0 TPY OC from coatings (See A.I.2.a.) 107.6 lbs OC/month and 0.65 TPY OC from cleanup materials 129.6 TPY OC (See A.I.2.b. for this combined limit.) VOC (See A.I.2.c.) 0.91 lb particulate emissions (PE)/hr and 4.0 TPY PE visible particulate emissions (See A.I.2.d.) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR 60, Subpart JJ.
	OAC rule 3745-21-07(G)(2)	none (See A.II.1.)
	OAC rule 3745-17-11(B)(2)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR 63.802(a)(1)	Emission limitations on volatile hazardous air pollutants (VHAP): - Topcoat: 1.0 lb VHAP/lb solids, as applied - Thinner: 10.0% VHAP by weight (each thinner)

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR 63.803	Prepare and maintain a work practice implementation plan (see section A.2.a. in Part II).

2. Additional Terms and Conditions

2.a The hourly and annual OC limitations for coatings were established for Permit to Install (PTI) purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping and reporting requirements are necessary to ensure compliance with these limitations.

2.b This is a combined limit established to avoid PSD review for VOC emissions resulting from a modification which increased the potential emissions. The modification is contained in PTI #03-11296, and the combined limit is enforced as a rolling 12-month summation of the OC input rates from coating and cleanup material usage for combined emissions units R001, R002, R003, R006, R007, and R008. All OC input rates are considered to be OC emission rates.

2.c For purposes of federal enforceability, all OCs are considered to be VOCs.

2.d Visible particulate emissions from any stack shall not exceed twenty per cent opacity as a six-minute average, except for not more than six consecutive minutes in any sixty minutes, and shall not exceed sixty per cent opacity, as a six-minute average, at any time.

II. Operational Restrictions

1. The permittee shall not employ any coating and/or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

3. The permittee shall only use coating materials in this emissions unit that comply with the applicable VHAP emission limitation in section A.I.1. on an "as applied" basis.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:

1.a For coating material usage in this emissions unit:

i. The company identification for each coating material employed.

ii. The determination of whether or not the coating material is a photochemically reactive material.

iii. The number of gallons of each coating material employed.

iv. The OC content of each coating material, in pounds/gallon.

v. The OC input rate for each coating material, in pounds/month [(A.III.1.a.iii.) x (A.III.1.a.iv.)].

vi. The total OC input rate for all coating materials, in pounds/month [summation of (A.III.1.a.v.)].

III. Monitoring and/or Record Keeping Requirements (continued)

1.b For cleanup material* usage in this emissions unit:

i. The company identification for each cleanup material employed.

ii. The determination of whether or not the cleanup material is a photochemically reactive material.

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

iv. The OC content of each cleanup material, in pounds/gallon.

v. The OC input rate for each cleanup material, in pounds/month [(A.III.1.b.iii.) x (A.III.1.b.iv.)].

vi. The total OC input rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.v.)].

vii. The total OC emission rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.v.)]. Note: The total OC emission rate for all cleanup materials is presumed to be the same as total OC input rate for all cleanup materials.

viii. The cumulative total OC emissions for the calendar year for all cleanup materials, in tons [summation of (A.III.1.b.vii.) for all months in the current calendar year, divided by 2000].

*Note: The permittee is only required to maintain records for cleanup materials that result in the emissions of OC.

1.c For coating and cleanup material usage in combined emissions units R001, R002, R003, R006, R007, and R008:

i. The total OC input rate for all coating materials, in pounds/month [summation of (A.III.1.a.vi) for the combined emission units].

ii. The total OC input rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.vi) for the combined emission units].

iii. The total OC input rate for all coating and cleanup materials, in pounds/month [(A.III.1.c.i) + (A.III.1.c.ii)].

iv. The total OC input rate for all coating and cleanup materials, in tons/rolling 12-month period [summation of (A.III.1.c.iii) for the current calendar month and the preceding 11 calendar months, divided by 2000].

2. In order to demonstrate compliance with the VHAP limits specified in section A.I.1., the permittee shall maintain records of the following information:

a. a certified product data sheet for each topcoat and thinner;

b. the VHAP content, in lbs VHAP/lb solids, as applied, of each topcoat; and

c. the VHAP content, in percent HAP by weight, of each thinner.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each of the following:

a. Each month during which the total OC input rate, in tons/rolling 12-month period for combined emission units R001, R002, R003, R006, R007, and R008, exceeded 129.6 TPY OC, and the recorded total OC input rate for each such month.

b. Each month during which the monthly or annual OC emissions from cleanup materials exceeded the respective monthly or annual OC emissions limit for cleanup materials specified in section A.I.1., and the actual OC emissions for each such exceedance.

c. Each day during which a coating or cleanup material classified as a photochemically reactive material was employed, and a copy of the documentation for each such photochemically reactive material.

d. Each day during which the dry filtration system did not operate when the emissions unit was in operation, and a copy of the record for each such day.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c. of the Part I - General Terms and Conditions of this permit.

2. Regarding the VHAP emission limitations in section A.I.1., the permittee shall submit semiannual compliance certification reports which state that compliant coating materials have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The emissions unit is in violation of the applicable VHAP emissions limit whenever a noncompliant coating material, as demonstrated by records or by a sample of the coating material, is used. If the emissions unit was in noncompliance, the permittee shall state the measures that were taken to bring the emissions unit into compliance.

The semiannual compliance certification reports shall be submitted within 30 days after each six-month period to the Ohio EPA Northwest District Office. The six-month periods are January through June and July through December.

V. Testing Requirements

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

1.a Emission Limitation:
20.1 lbs organic compound (OC)/hr and 88.0 TPY OC from coatings

Applicable Compliance Method:
The hourly and annual OC emission limitations are based on the emissions unit's potential to emit.* Therefore, no hourly or monthly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

*The potential to emit for this emissions unit was based on a maximum OC content of 4.79 lbs OC/gal and a maximum application rate of 4.20 gals/hr.

The tons/yr limitation was developed by multiplying the lbs/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

1.b Emission Limitation:
107.6 lbs OC/month and 0.65 TPY OC from cleanup materials

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit.

V. Testing Requirements (continued)

1.c Emission Limitation:
129.6 TPY OC (tons OC/rolling 12-month period; total OC input rate for combined emissions units R001, R002, R003, R006, R007, and R008)

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in section A.III.1. of the terms and conditions of this permit.

1.d Emission Limitation:
0.91 lb PE/hr and 4.0 TPY PE

Applicable Compliance Method:
The permittee may calculate actual PE rates for this emissions unit by utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = Particulate emissions rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

The tons/yr limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

If required, compliance with the PE limitation shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(10).

1.e Emission Limitation:
Topcoat: 1.0 lb VHAP/lb solids, as applied
Thinner: 10.0% VHAP by weight (each thinner)

Applicable Compliance Method:
The permittee shall demonstrate compliance with each VHAP emissions limit by means of the record keeping in section A.III.2. and the procedures in sections A.V.2. and A.V.3.

1.f Emission Limitation:
Visible particulate emissions from any stack shall not exceed twenty per cent opacity as a six-minute average, except for not more than six consecutive minutes in any sixty minutes, and shall not exceed sixty per cent opacity, as a six-minute average, at any time.

Applicable Compliance Method:
If required, the method to be employed to demonstrate compliance with the visible PE limitation shall be OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating or solvent shall be determined in accordance with the following:

a. EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. Method 311 shall then be used to quantify those VHAP identified through formulation data. Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during cure. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. EPA Method 24 (40 CFR part 60, appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Ohio EPA that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. In the event of any inconsistency between Method 24 or Method 311 test data and a facility's formulation data, that is, if the Method 24/311 value is higher, the Method 24/311 test shall govern unless after consultation, the permittee could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA- 340/1-91-010.

b. The permittee may request approval from the USEPA Administrator to use an alternative method for determining the VHAP content of the coating.

3. Certified product data sheet (CPDS) means documentation furnished by coating or adhesive suppliers or an outside laboratory that provides:

a. The VHAP content of a finishing material, contact adhesive, or solvent, by percent weight, measured using the EPA Method 311, or an equivalent or alternative method (or formulation data if the coating meets the criteria specified in section A.V.2.a.);

b. The solids content of a finishing material or contact adhesive by percent weight, determined using data from the EPA Method 24, or an alternative or equivalent method (or formulation data if the coating meets the criteria specified in section A.V.2.a.); and

c. The density, measured by EPA Method 24 or an alternative or equivalent method.

Therefore, the reportable VHAP content shall represent the maximum aggregate emissions potential of the finishing material, adhesive, or solvent in concentrations greater than or equal to 1.0 percent by weight or 0.1 percent for VHAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), as formulated. Only VHAP present in concentrations greater than or equal to 1.0 percent by weight, or 0.1 percent for VHAP that are carcinogens, must be reported on the CPDS. The purpose of the CPDS is to assist the permittee in demonstrating compliance with the emission limitations on volatile hazardous air pollutants.

Note: Because the optimum analytical conditions under EPA Method 311 vary by coating, the coating or adhesive supplier may also choose to include on the CPDS the optimum analytical conditions for analysis of the coating, adhesive, or solvent using EPA Method 311. Such information may include, but not be limited to, separation column, oven temperature, carrier gas, injection port temperature, extraction solvent, and internal standard.

4. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Stain Booth #1 (R003)

Activity Description: Dedicated stain application

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
stain spray booth w/ high volume low pressure (HVLP) guns for wood furniture; unit #1	OAC rule 3745-31-05 (PTI #03-11296, issued 7/29/98)	7.41 lbs organic compound (OC)/hr and 32.5 TPY OC from coatings (See A.I.2.a.) 15.7 lbs OC/month and 0.094 TPY OC from cleanup materials 129.6 TPY OC (See A.I.2.b. for this combined limit.) VOC (See A.I.2.c.) 0.086 lb particulate emissions (PE)/hr and 0.38 TPY PE visible particulate emissions (See A.I.2.d.) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR 60, Subpart JJ.
	OAC rule 3745-21-07(G)(2)	none (See A.II.1.)
	OAC rule 3745-17-11(B)(2)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR 63.802(a)(1)	Emission limitations on volatile hazardous air pollutants (VHAP): - Stain: 1.0 lb VHAP/lb solids, as applied - Thinner: 10.0% VHAP by weight (each thinner)

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR 63.803	Prepare and maintain a work practice implementation plan (see section A.2.a. in Part II).

2. Additional Terms and Conditions

2.a The hourly and annual OC limitations for coatings were established for Permit to Install (PTI) purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping and reporting requirements are necessary to ensure compliance with these limitations.

2.b This is a combined limit established to avoid PSD review for VOC emissions resulting from a modification which increased the potential emissions. The modification is contained in PTI #03-11296, and the combined limit is enforced as a rolling 12-month summation of the OC input rates from coating and cleanup material usage for combined emissions units R001, R002, R003, R006, R007, and R008. All OC input rates are considered to be OC emission rates.

2.c For purposes of federal enforceability, all OCs are considered to be VOCs.

2.d Visible particulate emissions from any stack shall not exceed twenty per cent opacity as a six-minute average, except for not more than six consecutive minutes in any sixty minutes, and shall not exceed sixty per cent opacity, as a six-minute average, at any time.

II. Operational Restrictions

1. The permittee shall not employ any coating and/or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

3. The permittee shall only use coating materials in this emissions unit that comply with the applicable VHAP emission limitation in section A.I.1. on an "as applied" basis.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:

1.a For coating material usage in this emissions unit:

i. The company identification for each coating material employed.

ii. The determination of whether or not the coating material is a photochemically reactive material.

iii. The number of gallons of each coating material employed.

iv. The OC content of each coating material, in pounds/gallon.

v. The OC input rate for each coating material, in pounds/month [(A.III.1.a.iii.) x (A.III.1.a.iv.)].

vi. The total OC input rate for all coating materials, in pounds/month [summation of (A.III.1.a.v.)].

III. Monitoring and/or Record Keeping Requirements (continued)

1.b For cleanup material* usage in this emissions unit:

i. The company identification for each cleanup material employed.

ii. The determination of whether or not the cleanup material is a photochemically reactive material.

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

iv. The OC content of each cleanup material, in pounds/gallon.

v. The OC input rate for each cleanup material, in pounds/month [(A.III.1.b.iii.) x (A.III.1.b.iv.)].

vi. The total OC input rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.v.)].

vii. The total OC emission rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.v.)]. Note: The total OC emission rate for all cleanup materials is presumed to be the same as total OC input rate for all cleanup materials.

viii. The cumulative total OC emissions for the calendar year for all cleanup materials, in tons [summation of (A.III.1.b.vii.) for all months in the current calendar year, divided by 2000].

*Note: The permittee is only required to maintain records for cleanup materials that result in the emissions of OC.

1.c For coating and cleanup material usage in combined emissions units R001, R002, R003, R006, R007, and R008:

i. The total OC input rate for all coating materials, in pounds/month [summation of (A.III.1.a.vi) for the combined emission units].

ii. The total OC input rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.vi) for the combined emission units].

iii. The total OC input rate for all coating and cleanup materials, in pounds/month [(A.III.1.c.i) + (A.III.1.c.ii)].

iv. The total OC input rate for all coating and cleanup materials, in tons/rolling 12-month period [summation of (A.III.1.c.iii) for the current calendar month and the preceding 11 calendar months, divided by 2000].

2. In order to demonstrate compliance with the VHAP limits specified in section A.I.1., the permittee shall maintain records of the following information:

a. a certified product data sheet for each stain and thinner;

b. the VHAP content, in lbs VHAP/lb solids, as applied, of each stain; and

c. the VHAP content, in percent HAP by weight, of each thinner.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each of the following:

a. Each month during which the total OC input rate, in tons/rolling 12-month period for combined emission units R001, R002, R003, R006, R007, and R008, exceeded 129.6 TPY OC, and the recorded total OC input rate for each such month.

b. Each month during which the monthly or annual OC emissions from cleanup materials exceeded the respective monthly or annual OC emissions limit for cleanup materials specified in section A.I.1., and the actual OC emissions for each such exceedance.

c. Each day during which a coating or cleanup material classified as a photochemically reactive material was employed, and a copy of the documentation for each such photochemically reactive material.

d. Each day during which the dry filtration system did not operate when the emissions unit was in operation, and a copy of the record for each such day.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c. of the Part I - General Terms and Conditions of this permit.

2. Regarding the VHAP emission limitations in section A.I.1., the permittee shall submit semiannual compliance certification reports which state that compliant coating materials have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The emissions unit is in violation of the applicable VHAP emissions limit whenever a noncompliant coating material, as demonstrated by records or by a sample of the coating material, is used. If the emissions unit was in noncompliance, the permittee shall state the measures that were taken to bring the emissions unit into compliance.

The semiannual compliance certification reports shall be submitted within 30 days after each six-month period to the Ohio EPA Northwest District Office. The six-month periods are January through June and July through December.

V. Testing Requirements

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

1.a Emission Limitation:
7.41 lbs organic compound (OC)/hr and 32.5 TPY OC from coatings

Applicable Compliance Method:
The hourly and annual OC emission limitations are based on the emissions unit's potential to emit.* Therefore, no hourly or monthly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

*The potential to emit for this emissions unit was based on a maximum OC content of 7.36 lbs OC/gal and a maximum application rate of 1.0 gal/hr.

The tons/yr limitation was developed by multiplying the lbs/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

1.b Emission Limitation:
15.7 lbs OC/month and 0.094 TPY OC from cleanup materials

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit.

V. Testing Requirements (continued)

1.c Emission Limitation:
129.6 TPY OC (tons OC/rolling 12-month period; total OC input rate for combined emissions units R001, R002, R003, R006, R007, and R008)

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in section A.III.1. of the terms and conditions of this permit.

1.d Emission Limitation:
0.086 lb PE/hr and 0.38 TPY PE

Applicable Compliance Method:
The permittee may calculate actual PE rates for this emissions unit by utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = Particulate emissions rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

The tons/yr limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

If required, compliance with the PE limitation shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(10).

1.e Emission Limitation:
Stain: 1.0 lb VHAP/lb solids, as applied
Thinner: 10.0% VHAP by weight (each thinner)

Applicable Compliance Method:
The permittee shall demonstrate compliance with each VHAP emissions limit by means of the record keeping in section A.III.2. and the procedures in sections A.V.2. and A.V.3.

1.f Emission Limitation:
Visible particulate emissions from any stack shall not exceed twenty per cent opacity as a six-minute average, except for not more than six consecutive minutes in any sixty minutes, and shall not exceed sixty per cent opacity, as a six-minute average, at any time.

Applicable Compliance Method:
If required, the method to be employed to demonstrate compliance with the visible PE limitation shall be OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating or solvent shall be determined in accordance with the following:

a. EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. Method 311 shall then be used to quantify those VHAP identified through formulation data. Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during cure. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. EPA Method 24 (40 CFR part 60, appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Ohio EPA that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. In the event of any inconsistency between Method 24 or Method 311 test data and a facility's formulation data, that is, if the Method 24/311 value is higher, the Method 24/311 test shall govern unless after consultation, the permittee could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA- 340/1-91-010.

b. The permittee may request approval from the USEPA Administrator to use an alternative method for determining the VHAP content of the coating.

3. Certified product data sheet (CPDS) means documentation furnished by coating or adhesive suppliers or an outside laboratory that provides:

a. The VHAP content of a finishing material, contact adhesive, or solvent, by percent weight, measured using the EPA Method 311, or an equivalent or alternative method (or formulation data if the coating meets the criteria specified in section A.V.2.a.);

b. The solids content of a finishing material or contact adhesive by percent weight, determined using data from the EPA Method 24, or an alternative or equivalent method (or formulation data if the coating meets the criteria specified in section A.V.2.a.); and

c. The density, measured by EPA Method 24 or an alternative or equivalent method.

Therefore, the reportable VHAP content shall represent the maximum aggregate emissions potential of the finishing material, adhesive, or solvent in concentrations greater than or equal to 1.0 percent by weight or 0.1 percent for VHAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), as formulated. Only VHAP present in concentrations greater than or equal to 1.0 percent by weight, or 0.1 percent for VHAP that are carcinogens, must be reported on the CPDS. The purpose of the CPDS is to assist the permittee in demonstrating compliance with the emission limitations on volatile hazardous air pollutants.

Note: Because the optimum analytical conditions under EPA Method 311 vary by coating, the coating or adhesive supplier may also choose to include on the CPDS the optimum analytical conditions for analysis of the coating, adhesive, or solvent using EPA Method 311. Such information may include, but not be limited to, separation column, oven temperature, carrier gas, injection port temperature, extraction solvent, and internal standard.

4. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Foam Adhesive Booth (R005)

Activity Description: Adhesive is applied to foam and fabric in this booth. The adhesive is used to attach upholstry to the furniture.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
foam adhesive booth with air spray for wood furniture	OAC rule 3745-21-07(G)(2)	none (See A.II.1.)
	40 CFR 63.802(a)(2)(i)	1.8 lbs volatile hazardous air pollutant (VHAP)/lb solids, as applied, for foam adhesives
	OAC rule 3745-17-11(B)(2)	none (See A.I.2.a.)
	OAC rule 3745-17-07(A)	none (See A.I.2.b.)
	40 CFR 63.803	Prepare and maintain a work practice implementation plan (see section A.2.a. in Part II).

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Williams County, which is identified as a P-2 county.

2.b This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

1. The permittee shall not employ any foam adhesive or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2. The permittee shall only use coating materials in this emissions unit that comply with the applicable VHAP emission limitation in section A.I.1. on an "as applied" basis.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following information each day for this emissions unit:

a. the company identification for each adhesive material employed;

b. documentation on whether or not each adhesive material employed is a photochemically reactive material;

c. the company identification for each cleanup material employed; and

d. documentation on whether or not each cleanup material employed is a photochemically reactive material.

2. In order to demonstrate compliance with the VHAP limit specified in section A.I.1., the permittee shall maintain records of the following information for each foam adhesive:

a. a certified product data sheet; and

b. the VHAP content, in lbs VHAP/lb solids, as applied.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which a foam adhesive or cleanup material classified as a photochemically reactive material was employed, and include a copy of the documentation for each such photochemically reactive material.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c. of the Part I - General Terms and Conditions of this permit.

2. Regarding the VHAP emission limitations in section A.I.1., the permittee shall submit semiannual compliance certification reports which state that compliant coating materials have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The emissions unit is in violation of the applicable VHAP emissions limit whenever a noncompliant coating material, as demonstrated by records or by a sample of the coating material, is used. If the emissions unit was in noncompliance, the permittee shall state the measures that were taken to bring the emissions unit into compliance.

The semiannual compliance certification reports shall be submitted within 30 days after each six-month period to the Ohio EPA Northwest District Office. The six-month periods are January through June and July through December.

V. Testing Requirements

1. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

Emission Limitation:
1.8 lbs volatile hazardous air pollutant (VHAP)/lb solids, as applied, for foam adhesives

Applicable Compliance Method:
The permittee shall demonstrate compliance with the VHAP emissions limit by means of the record keeping in section A.III.2. and the procedures in sections A.V.2. and A.V.3.

V. Testing Requirements (continued)

2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating or solvent shall be determined in accordance with the following:

a. EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. Method 311 shall then be used to quantify those VHAP identified through formulation data. Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during cure. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. EPA Method 24 (40 CFR part 60, appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Ohio EPA that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. In the event of any inconsistency between Method 24 or Method 311 test data and a facility's formulation data, that is, if the Method 24/311 value is higher, the Method 24/311 test shall govern unless after consultation, the permittee could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA- 340/1-91-010.

b. The permittee may request approval from the USEPA Administrator to use an alternative method for determining the VHAP content of the coating.

3. Certified product data sheet (CPDS) means documentation furnished by coating or adhesive suppliers or an outside laboratory that provides:

a. The VHAP content of a finishing material, contact adhesive, or solvent, by percent weight, measured using the EPA Method 311, or an equivalent or alternative method (or formulation data if the coating meets the criteria specified in section A.V.2.a.);

b. The solids content of a finishing material or contact adhesive by percent weight, determined using data from the EPA Method 24, or an alternative or equivalent method (or formulation data if the coating meets the criteria specified in section A.V.2.a.); and

c. The density, measured by EPA Method 24 or an alternative or equivalent method.

Therefore, the reportable VHAP content shall represent the maximum aggregate emissions potential of the finishing material, adhesive, or solvent in concentrations greater than or equal to 1.0 percent by weight or 0.1 percent for VHAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), as formulated. Only VHAP present in concentrations greater than or equal to 1.0 percent by weight, or 0.1 percent for VHAP that are carcinogens, must be reported on the CPDS. The purpose of the CPDS is to assist the permittee in demonstrating compliance with the emission limitations on volatile hazardous air pollutants.

Note: Because the optimum analytical conditions under EPA Method 311 vary by coating, the coating or adhesive supplier may also choose to include on the CPDS the optimum analytical conditions for analysis of the coating, adhesive, or solvent using EPA Method 311. Such information may include, but not be limited to, separation column, oven temperature, carrier gas, injection port temperature, extraction solvent, and internal standard.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Stain Booth #2 (R006)

Activity Description: Dedicated stain application

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
stain spray booth w/ high volume low pressure (HVLP) guns for wood furniture; unit #2	OAC rule 3745-31-05 (PTI #03-11296, issued 7/29/98)	7.41 lbs organic compound (OC)/hr and 32.5 TPY OC from coatings (See A.I.2.a.) 15.7 lbs OC/month and 0.094 TPY OC from cleanup materials 129.6 TPY OC (See A.I.2.b. for this combined limit.) VOC (See A.I.2.c.) 0.086 lb particulate emissions (PE)/hr and 0.38 TPY PE visible particulate emissions (See A.I.2.d.) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR 60, Subpart JJ.
	OAC rule 3745-21-07(G)(2)	none (See A.II.1.)
	OAC rule 3745-17-11(B)(2)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR 63.802(a)(1)	Emission limitations on volatile hazardous air pollutants (VHAP): - Stain: 1.0 lb VHAP/lb solids, as applied - Thinner: 10.0% VHAP by weight (each thinner)

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR 63.803	Prepare and maintain a work practice implementation plan (see section A.2.a. in Part II).

2. Additional Terms and Conditions

2.a The hourly and annual OC limitations for coatings were established for Permit to Install (PTI) purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping and reporting requirements are necessary to ensure compliance with these limitations.

2.b This is a combined limit established to avoid PSD review for VOC emissions resulting from a modification which increased the potential emissions. The modification is contained in PTI #03-11296, and the combined limit is enforced as a rolling 12-month summation of the OC input rates from coating and cleanup material usage for combined emissions units R001, R002, R003, R006, R007, and R008. All OC input rates are considered to be OC emission rates.

2.c For purposes of federal enforceability, all OCs are considered to be VOCs.

2.d Visible particulate emissions from any stack shall not exceed twenty per cent opacity as a six-minute average, except for not more than six consecutive minutes in any sixty minutes, and shall not exceed sixty per cent opacity, as a six-minute average, at any time.

II. Operational Restrictions

1. The permittee shall not employ any coating and/or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

3. The permittee shall only use coating materials in this emissions unit that comply with the applicable VHAP emission limitation in section A.I.1. on an "as applied" basis.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:

1.a For coating material usage in this emissions unit:

i. The company identification for each coating material employed.

ii. The determination of whether or not the coating material is a photochemically reactive material.

iii. The number of gallons of each coating material employed.

iv. The OC content of each coating material, in pounds/gallon.

v. The OC input rate for each coating material, in pounds/month [(A.III.1.a.iii.) x (A.III.1.a.iv.)].

vi. The total OC input rate for all coating materials, in pounds/month [summation of (A.III.1.a.v.)].

III. Monitoring and/or Record Keeping Requirements (continued)

1.b For cleanup material* usage in this emissions unit:

i. The company identification for each cleanup material employed.

ii. The determination of whether or not the cleanup material is a photochemically reactive material.

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

iv. The OC content of each cleanup material, in pounds/gallon.

v. The OC input rate for each cleanup material, in pounds/month [(A.III.1.b.iii.) x (A.III.1.b.iv.)].

vi. The total OC input rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.v.)].

vii. The total OC emission rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.v.)]. Note: The total OC emission rate for all cleanup materials is presumed to be the same as total OC input rate for all cleanup materials.

viii. The cumulative total OC emissions for the calendar year for all cleanup materials, in tons [summation of (A.III.1.b.vii.) for all months in the current calendar year, divided by 2000].

*Note: The permittee is only required to maintain records for cleanup materials that result in the emissions of OC.

1.c For coating and cleanup material usage in combined emissions units R001, R002, R003, R006, R007, and R008:

i. The total OC input rate for all coating materials, in pounds/month [summation of (A.III.1.a.vi) for the combined emission units].

ii. The total OC input rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.vi) for the combined emission units].

iii. The total OC input rate for all coating and cleanup materials, in pounds/month [(A.III.1.c.i) + (A.III.1.c.ii)].

iv. The total OC input rate for all coating and cleanup materials, in tons/rolling 12-month period [summation of (A.III.1.c.iii) for the current calendar month and the preceding 11 calendar months, divided by 2000].

2. In order to demonstrate compliance with the VHAP limits specified in section A.I.1., the permittee shall maintain records of the following information:

a. a certified product data sheet for each stain and thinner;

b. the VHAP content, in lbs VHAP/lb solids, as applied, of each stain; and

c. the VHAP content, in percent HAP by weight, of each thinner.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each of the following:

a. Each month during which the total OC input rate, in tons/rolling 12-month period for combined emission units R001, R002, R003, R006, R007, and R008, exceeded 129.6 TPY OC, and the recorded total OC input rate for each such month.

b. Each month during which the monthly or annual OC emissions from cleanup materials exceeded the respective monthly or annual OC emissions limit for cleanup materials specified in section A.I.1., and the actual OC emissions for each such exceedance.

c. Each day during which a coating or cleanup material classified as a photochemically reactive material was employed, and a copy of the documentation for each such photochemically reactive material.

d. Each day during which the dry filtration system did not operate when the emissions unit was in operation, and a copy of the record for each such day.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c. of the Part I - General Terms and Conditions of this permit.

2. Regarding the VHAP emission limitations in section A.I.1., the permittee shall submit semiannual compliance certification reports which state that compliant coating materials have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The emissions unit is in violation of the applicable VHAP emissions limit whenever a noncompliant coating material, as demonstrated by records or by a sample of the coating material, is used. If the emissions unit was in noncompliance, the permittee shall state the measures that were taken to bring the emissions unit into compliance.

The semiannual compliance certification reports shall be submitted within 30 days after each six-month period to the Ohio EPA Northwest District Office. The six-month periods are January through June and July through December.

V. Testing Requirements

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

1.a Emission Limitation:
7.41 lbs organic compound (OC)/hr and 32.5 TPY OC from coatings

Applicable Compliance Method:
The hourly and annual OC emission limitations are based on the emissions unit's potential to emit.* Therefore, no hourly or monthly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

*The potential to emit for this emissions unit was based on a maximum OC content of 7.36 lbs OC/gal and a maximum application rate of 1.0 gal/hr.

The tons/yr limitation was developed by multiplying the lbs/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

1.b Emission Limitation:
15.7 lbs OC/month and 0.094 TPY OC from cleanup materials

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit.

V. Testing Requirements (continued)

1.c Emission Limitation:
129.6 TPY OC (tons OC/rolling 12-month period; total OC input rate for combined emissions units R001, R002, R003, R006, R007, and R008)

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in section A.III.1. of the terms and conditions of this permit.

1.d Emission Limitation:
0.086 lb PE/hr and 0.38 TPY PE

Applicable Compliance Method:
The permittee may calculate actual PE rates for this emissions unit by utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = Particulate emissions rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

The tons/yr limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

If required, compliance with the PE limitation shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(10).

1.e Emission Limitation:
Stain: 1.0 lb VHAP/lb solids, as applied
Thinner: 10.0% VHAP by weight (each thinner)

Applicable Compliance Method:
The permittee shall demonstrate compliance with each VHAP emissions limit by means of the record keeping in section A.III.2. and the procedures in sections A.V.2. and A.V.3.

1.f Emission Limitation:
Visible particulate emissions from any stack shall not exceed twenty per cent opacity as a six-minute average, except for not more than six consecutive minutes in any sixty minutes, and shall not exceed sixty per cent opacity, as a six-minute average, at any time.

Applicable Compliance Method:
If required, the method to be employed to demonstrate compliance with the visible PE limitation shall be OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating or solvent shall be determined in accordance with the following:

a. EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. Method 311 shall then be used to quantify those VHAP identified through formulation data. Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during cure. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. EPA Method 24 (40 CFR part 60, appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Ohio EPA that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. In the event of any inconsistency between Method 24 or Method 311 test data and a facility's formulation data, that is, if the Method 24/311 value is higher, the Method 24/311 test shall govern unless after consultation, the permittee could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA- 340/1-91-010.

b. The permittee may request approval from the USEPA Administrator to use an alternative method for determining the VHAP content of the coating.

3. Certified product data sheet (CPDS) means documentation furnished by coating or adhesive suppliers or an outside laboratory that provides:

a. The VHAP content of a finishing material, contact adhesive, or solvent, by percent weight, measured using the EPA Method 311, or an equivalent or alternative method (or formulation data if the coating meets the criteria specified in section A.V.2.a.);

b. The solids content of a finishing material or contact adhesive by percent weight, determined using data from the EPA Method 24, or an alternative or equivalent method (or formulation data if the coating meets the criteria specified in section A.V.2.a.); and

c. The density, measured by EPA Method 24 or an alternative or equivalent method.

Therefore, the reportable VHAP content shall represent the maximum aggregate emissions potential of the finishing material, adhesive, or solvent in concentrations greater than or equal to 1.0 percent by weight or 0.1 percent for VHAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), as formulated. Only VHAP present in concentrations greater than or equal to 1.0 percent by weight, or 0.1 percent for VHAP that are carcinogens, must be reported on the CPDS. The purpose of the CPDS is to assist the permittee in demonstrating compliance with the emission limitations on volatile hazardous air pollutants.

Note: Because the optimum analytical conditions under EPA Method 311 vary by coating, the coating or adhesive supplier may also choose to include on the CPDS the optimum analytical conditions for analysis of the coating, adhesive, or solvent using EPA Method 311. Such information may include, but not be limited to, separation column, oven temperature, carrier gas, injection port temperature, extraction solvent, and internal standard.

4. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Stain Booth #3 (R007)

Activity Description: Dedicated stain application

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
stain spray booth w/ high volume low pressure (HVLP) guns for wood furniture; unit #3	OAC rule 3745-31-05 (PTI #03-11296, issued 7/29/98)	7.41 lbs organic compound (OC)/hr and 32.5 TPY OC from coatings (See A.I.2.a.) 15.7 lbs OC/month and 0.094 TPY OC from cleanup materials 129.6 TPY OC (See A.I.2.b. for this combined limit.) VOC (See A.I.2.c.) 0.086 lb particulate emissions (PE)/hr and 0.38 TPY PE visible particulate emissions (See A.I.2.d.) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR 60, Subpart JJ.
	OAC rule 3745-21-07(G)(2)	none (See A.II.1.)
	OAC rule 3745-17-11(B)(2)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR 63.802(a)(1)	Emission limitations on volatile hazardous air pollutants (VHAP): - Stain: 1.0 lb VHAP/lb solids, as applied - Thinner: 10.0% VHAP by weight (each thinner)

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR 63.803	Prepare and maintain a work practice implementation plan (see section A.2.a. in Part II).

2. Additional Terms and Conditions

2.a The hourly and annual OC limitations for coatings were established for Permit to Install (PTI) purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping and reporting requirements are necessary to ensure compliance with these limitations.

2.b This is a combined limit established to avoid PSD review for VOC emissions resulting from a modification which increased the potential emissions. The modification is contained in PTI #03-11296, and the combined limit is enforced as a rolling 12-month summation of the OC input rates from coating and cleanup material usage for combined emissions units R001, R002, R003, R006, R007, and R008. All OC input rates are considered to be OC emission rates.

2.c For purposes of federal enforceability, all OCs are considered to be VOCs.

2.d Visible particulate emissions from any stack shall not exceed twenty per cent opacity as a six-minute average, except for not more than six consecutive minutes in any sixty minutes, and shall not exceed sixty per cent opacity, as a six-minute average, at any time.

II. Operational Restrictions

1. The permittee shall not employ any coating and/or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

3. The permittee shall only use coating materials in this emissions unit that comply with the applicable VHAP emission limitation in section A.I.1. on an "as applied" basis.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:

1.a For coating material usage in this emissions unit:

i. The company identification for each coating material employed.

ii. The determination of whether or not the coating material is a photochemically reactive material.

iii. The number of gallons of each coating material employed.

iv. The OC content of each coating material, in pounds/gallon.

v. The OC input rate for each coating material, in pounds/month [(A.III.1.a.iii.) x (A.III.1.a.iv.)].

vi. The total OC input rate for all coating materials, in pounds/month [summation of (A.III.1.a.v.)].

III. Monitoring and/or Record Keeping Requirements (continued)

1.b For cleanup material* usage in this emissions unit:

i. The company identification for each cleanup material employed.

ii. The determination of whether or not the cleanup material is a photochemically reactive material.

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

iv. The OC content of each cleanup material, in pounds/gallon.

v. The OC input rate for each cleanup material, in pounds/month [(A.III.1.b.iii.) x (A.III.1.b.iv.)].

vi. The total OC input rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.v.)].

vii. The total OC emission rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.v.)]. Note: The total OC emission rate for all cleanup materials is presumed to be the same as total OC input rate for all cleanup materials.

viii. The cumulative total OC emissions for the calendar year for all cleanup materials, in tons [summation of (A.III.1.b.vii.) for all months in the current calendar year, divided by 2000].

*Note: The permittee is only required to maintain records for cleanup materials that result in the emissions of OC.

1.c For coating and cleanup material usage in combined emissions units R001, R002, R003, R006, R007, and R008::

i. The total OC input rate for all coating materials, in pounds/month [summation of (A.III.1.a.vi) for the combined emission units].

ii. The total OC input rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.vi) for the combined emission units].

iii. The total OC input rate for all coating and cleanup materials, in pounds/month [(A.III.1.c.i) + (A.III.1.c.ii)].

iv. The total OC input rate for all coating and cleanup materials, in tons/rolling 12-month period [summation of (A.III.1.c.iii) for the current calendar month and the preceding 11 calendar months, divided by 2000].

2. In order to demonstrate compliance with the VHAP limits specified in section A.I.1., the permittee shall maintain records of the following information:

a. a certified product data sheet for each stain and thinner;

b. the VHAP content, in lbs VHAP/lb solids, as applied, of each stain; and

c. the VHAP content, in percent HAP by weight, of each thinner.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each of the following:

a. Each month during which the total OC input rate, in tons/rolling 12-month period for combined emission units R001, R002, R003, R006, R007, and R008, exceeded 129.6 TPY OC, and the recorded total OC input rate for each such month.

b. Each month during which the monthly or annual OC emissions from cleanup materials exceeded the respective monthly or annual OC emissions limit for cleanup materials specified in section A.I.1., and the actual OC emissions for each such exceedance.

c. Each day during which a coating or cleanup material classified as a photochemically reactive material was employed, and a copy of the documentation for each such photochemically reactive material.

d. Each day during which the dry filtration system did not operate when the emissions unit was in operation, and a copy of the record for each such day.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c. of the Part I - General Terms and Conditions of this permit.

2. Regarding the VHAP emission limitations in section A.I.1., the permittee shall submit semiannual compliance certification reports which state that compliant coating materials have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The emissions unit is in violation of the applicable VHAP emissions limit whenever a noncompliant coating material, as demonstrated by records or by a sample of the coating material, is used. If the emissions unit was in noncompliance, the permittee shall state the measures that were taken to bring the emissions unit into compliance.

The semiannual compliance certification reports shall be submitted within 30 days after each six-month period to the Ohio EPA Northwest District Office. The six-month periods are January through June and July through December.

V. Testing Requirements

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

1.a Emission Limitation:
7.41 lbs organic compound (OC)/hr and 32.5 TPY OC from coatings

Applicable Compliance Method:
The hourly and annual OC emission limitations are based on the emissions unit's potential to emit.* Therefore, no hourly or monthly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

*The potential to emit for this emissions unit was based on a maximum OC content of 7.36 lbs OC/gal and a maximum application rate of 1.0 gal/hr.

The tons/yr limitation was developed by multiplying the lbs/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

1.b Emission Limitation:
15.7 lbs OC/month and 0.094 TPY OC from cleanup materials

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit.

V. Testing Requirements (continued)

1.c Emission Limitation:
129.6 TPY OC (tons OC/rolling 12-month period; total OC input rate for combined emissions units R001, R002, R003, R006, R007, and R008)

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in section A.III.1. of the terms and conditions of this permit.

1.d Emission Limitation:
0.086 lb PE/hr and 0.38 TPY PE

Applicable Compliance Method:
The permittee may calculate actual PE rates for this emissions unit by utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = Particulate emissions rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

The tons/yr limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

If required, compliance with the PE limitation shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(10).

1.e Emission Limitation:
Stain: 1.0 lb VHAP/lb solids, as applied
Thinner: 10.0% VHAP by weight (each thinner)

Applicable Compliance Method:
The permittee shall demonstrate compliance with each VHAP emissions limit by means of the record keeping in section A.III.2. and the procedures in sections A.V.2. and A.V.3.

1.f Emission Limitation:
Visible particulate emissions from any stack shall not exceed twenty per cent opacity as a six-minute average, except for not more than six consecutive minutes in any sixty minutes, and shall not exceed sixty per cent opacity, as a six-minute average, at any time.

Applicable Compliance Method:
If required, the method to be employed to demonstrate compliance with the visible PE limitation shall be OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating or solvent shall be determined in accordance with the following:

a. EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. Method 311 shall then be used to quantify those VHAP identified through formulation data. Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during cure. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. EPA Method 24 (40 CFR part 60, appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Ohio EPA that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. In the event of any inconsistency between Method 24 or Method 311 test data and a facility's formulation data, that is, if the Method 24/311 value is higher, the Method 24/311 test shall govern unless after consultation, the permittee could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA- 340/1-91-010.

b. The permittee may request approval from the USEPA Administrator to use an alternative method for determining the VHAP content of the coating.

3. Certified product data sheet (CPDS) means documentation furnished by coating or adhesive suppliers or an outside laboratory that provides:

a. The VHAP content of a finishing material, contact adhesive, or solvent, by percent weight, measured using the EPA Method 311, or an equivalent or alternative method (or formulation data if the coating meets the criteria specified in section A.V.2.a.);

b. The solids content of a finishing material or contact adhesive by percent weight, determined using data from the EPA Method 24, or an alternative or equivalent method (or formulation data if the coating meets the criteria specified in section A.V.2.a.); and

c. The density, measured by EPA Method 24 or an alternative or equivalent method.

Therefore, the reportable VHAP content shall represent the maximum aggregate emissions potential of the finishing material, adhesive, or solvent in concentrations greater than or equal to 1.0 percent by weight or 0.1 percent for VHAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), as formulated. Only VHAP present in concentrations greater than or equal to 1.0 percent by weight, or 0.1 percent for VHAP that are carcinogens, must be reported on the CPDS. The purpose of the CPDS is to assist the permittee in demonstrating compliance with the emission limitations on volatile hazardous air pollutants.

Note: Because the optimum analytical conditions under EPA Method 311 vary by coating, the coating or adhesive supplier may also choose to include on the CPDS the optimum analytical conditions for analysis of the coating, adhesive, or solvent using EPA Method 311. Such information may include, but not be limited to, separation column, oven temperature, carrier gas, injection port temperature, extraction solvent, and internal standard.

4. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Stain Booth #4 (R008)

Activity Description: Dedicated stain application

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
stain spray booth w/ high volume low pressure (HVLP) guns for wood furniture; unit #4	OAC rule 3745-31-05 (PTI #03-11296, issued 7/29/98)	7.41 lbs organic compound (OC)/hr and 32.5 TPY OC from coatings (See A.I.2.a.) 15.7 lbs OC/month and 0.094 TPY OC from cleanup materials 129.6 TPY OC (See A.I.2.b. for this combined limit.) VOC (See A.I.2.c.) 0.086 lb particulate emissions (PE)/hr and 0.38 TPY PE visible particulate emissions (See A.I.2.d.) The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) and 40 CFR 60, Subpart JJ.
	OAC rule 3745-21-07(G)(2)	none (See A.II.1.)
	OAC rule 3745-17-11(B)(2)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR 63.802(a)(1)	Emission limitations on volatile hazardous air pollutants (VHAP): - Stain: 1.0 lb VHAP/lb solids, as applied - Thinner: 10.0% VHAP by weight (each thinner)

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	40 CFR 63.803	Prepare and maintain a work practice implementation plan (see section A.2.a. in Part II).

2. Additional Terms and Conditions

2.a The hourly and annual OC limitations for coatings were established for Permit to Install (PTI) purposes to reflect the potentials to emit for this emissions unit. Therefore, no record keeping and reporting requirements are necessary to ensure compliance with these limitations.

2.b This is a combined limit established to avoid PSD review for VOC emissions resulting from a modification which increased the potential emissions. The modification is contained in PTI #03-11296, and the combined limit is enforced as a rolling 12-month summation of the OC input rates from coating and cleanup material usage for combined emissions units R001, R002, R003, R006, R007, and R008. All OC input rates are considered to be OC emission rates.

2.c For purposes of federal enforceability, all OCs are considered to be VOCs.

2.d Visible particulate emissions from any stack shall not exceed twenty per cent opacity as a six-minute average, except for not more than six consecutive minutes in any sixty minutes, and shall not exceed sixty per cent opacity, as a six-minute average, at any time.

II. Operational Restrictions

1. The permittee shall not employ any coating and/or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

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

3. The permittee shall only use coating materials in this emissions unit that comply with the applicable VHAP emission limitation in section A.I.1. on an "as applied" basis.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:

1.a For coating material usage in this emissions unit:

i. The company identification for each coating material employed.

ii. The determination of whether or not the coating material is a photochemically reactive material.

iii. The number of gallons of each coating material employed.

iv. The OC content of each coating material, in pounds/gallon.

v. The OC input rate for each coating material, in pounds/month [(A.III.1.a.iii.) x (A.III.1.a.iv.)].

vi. The total OC input rate for all coating materials, in pounds/month [summation of (A.III.1.a.v.)].

III. Monitoring and/or Record Keeping Requirements (continued)

1.b For cleanup material* usage in this emissions unit:

i. The company identification for each cleanup material employed.

ii. The determination of whether or not the cleanup material is a photochemically reactive material.

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

iv. The OC content of each cleanup material, in pounds/gallon.

v. The OC input rate for each cleanup material, in pounds/month [(A.III.1.b.iii.) x (A.III.1.b.iv.)].

vi. The total OC input rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.v.)].

vii. The total OC emission rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.v.)]. Note: The total OC emission rate for all cleanup materials is presumed to be the same as total OC input rate for all cleanup materials.

viii. The cumulative total OC emissions for the calendar year for all cleanup materials, in tons [summation of (A.III.1.b.vii.) for all months in the current calendar year, divided by 2000].

*Note: The permittee is only required to maintain records for cleanup materials that result in the emissions of OC.

1.c For coating and cleanup material usage in combined emissions units R001, R002, R003, R006, R007, and R008:

i. The total OC input rate for all coating materials, in pounds/month [summation of (A.III.1.a.vi) for the combined emission units].

ii. The total OC input rate for all cleanup materials, in pounds/month [summation of (A.III.1.b.vi) for the combined emission units].

iii. The total OC input rate for all coating and cleanup materials, in pounds/month [(A.III.1.c.i) + (A.III.1.c.ii)].

iv. The total OC input rate for all coating and cleanup materials, in tons/rolling 12-month period [summation of (A.III.1.c.iii) for the current calendar month and the preceding 11 calendar months, divided by 2000].

2. In order to demonstrate compliance with the VHAP limits specified in section A.I.1., the permittee shall maintain records of the following information:

a. a certified product data sheet for each stain and thinner;

b. the VHAP content, in lbs VHAP/lb solids, as applied, of each stain; and

c. the VHAP content, in percent HAP by weight, of each thinner.

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

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each of the following:

a. Each month during which the total OC input rate, in tons/rolling 12-month period for combined emission units R001, R002, R003, R006, R007, and R008, exceeded 129.6 TPY OC, and the recorded total OC input rate for each such month.

b. Each month during which the monthly or annual OC emissions from cleanup materials exceeded the respective monthly or annual OC emissions limit for cleanup materials specified in section A.I.1., and the actual OC emissions for each such exceedance.

c. Each day during which a coating or cleanup material classified as a photochemically reactive material was employed, and a copy of the documentation for each such photochemically reactive material.

d. Each day during which the dry filtration system did not operate when the emissions unit was in operation, and a copy of the record for each such day.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c. of the Part I - General Terms and Conditions of this permit.

2. Regarding the VHAP emission limitations in section A.I.1., the permittee shall submit semiannual compliance certification reports which state that compliant coating materials have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The emissions unit is in violation of the applicable VHAP emissions limit whenever a noncompliant coating material, as demonstrated by records or by a sample of the coating material, is used. If the emissions unit was in noncompliance, the permittee shall state the measures that were taken to bring the emissions unit into compliance.

The semiannual compliance certification reports shall be submitted within 30 days after each six-month period to the Ohio EPA Northwest District Office. The six-month periods are January through June and July through December.

V. Testing Requirements

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

1.a Emission Limitation:
7.41 lbs organic compound (OC)/hr and 32.5 TPY OC from coatings

Applicable Compliance Method:
The hourly and annual OC emission limitations are based on the emissions unit's potential to emit.* Therefore, no hourly or monthly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limitations.

*The potential to emit for this emissions unit was based on a maximum OC content of 7.36 lbs OC/gal and a maximum application rate of 1.0 gal/hr.

The tons/yr limitation was developed by multiplying the lbs/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

1.b Emission Limitation:
15.7 lbs OC/month and 0.094 TPY OC from cleanup materials

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in section A.III.1 of the terms and conditions of this permit.

V. Testing Requirements (continued)

1.c Emission Limitation:
129.6 TPY OC (tons OC/rolling 12-month period; total OC input rate for combined emissions units R001, R002, R003, R006, R007, and R008)

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in section A.III.1. of the terms and conditions of this permit.

1.d Emission Limitation:
0.086 lb PE/hr and 0.38 TPY PE

Applicable Compliance Method:
The permittee may calculate actual PE rates for this emissions unit by utilizing the following equation:

E = (maximum coating solids usage rate) x (1-TE) x (1-CE)

where:

E = Particulate emissions rate (pounds/hour).

TE = Transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used.

CE = Control efficiency of the control equipment (filters).

The tons/yr limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

If required, compliance with the PE limitation shall be determined in accordance with the test method and procedures in OAC rule 3745-17-03(B)(10).

1.e Emission Limitation:
Stain: 1.0 lb VHAP/lb solids, as applied
Thinner: 10.0% VHAP by weight (each thinner)

Applicable Compliance Method:
The permittee shall demonstrate compliance with each VHAP emissions limit by means of the record keeping in section A.III.2. and the procedures in sections A.V.2. and A.V.3.

1.f Emission Limitation:
Visible particulate emissions from any stack shall not exceed twenty per cent opacity as a six-minute average, except for not more than six consecutive minutes in any sixty minutes, and shall not exceed sixty per cent opacity, as a six-minute average, at any time.

Applicable Compliance Method:
If required, the method to be employed to demonstrate compliance with the visible PE limitation shall be OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating or solvent shall be determined in accordance with the following:

a. EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. Method 311 shall then be used to quantify those VHAP identified through formulation data. Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during cure. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. EPA Method 24 (40 CFR part 60, appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Ohio EPA that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. In the event of any inconsistency between Method 24 or Method 311 test data and a facility's formulation data, that is, if the Method 24/311 value is higher, the Method 24/311 test shall govern unless after consultation, the permittee could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA- 340/1-91-010.

b. The permittee may request approval from the USEPA Administrator to use an alternative method for determining the VHAP content of the coating.

3. Certified product data sheet (CPDS) means documentation furnished by coating or adhesive suppliers or an outside laboratory that provides:

a. The VHAP content of a finishing material, contact adhesive, or solvent, by percent weight, measured using the EPA Method 311, or an equivalent or alternative method (or formulation data if the coating meets the criteria specified in section A.V.2.a.);

b. The solids content of a finishing material or contact adhesive by percent weight, determined using data from the EPA Method 24, or an alternative or equivalent method (or formulation data if the coating meets the criteria specified in section A.V.2.a.); and

c. The density, measured by EPA Method 24 or an alternative or equivalent method.

Therefore, the reportable VHAP content shall represent the maximum aggregate emissions potential of the finishing material, adhesive, or solvent in concentrations greater than or equal to 1.0 percent by weight or 0.1 percent for VHAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), as formulated. Only VHAP present in concentrations greater than or equal to 1.0 percent by weight, or 0.1 percent for VHAP that are carcinogens, must be reported on the CPDS. The purpose of the CPDS is to assist the permittee in demonstrating compliance with the emission limitations on volatile hazardous air pollutants.

Note: Because the optimum analytical conditions under EPA Method 311 vary by coating, the coating or adhesive supplier may also choose to include on the CPDS the optimum analytical conditions for analysis of the coating, adhesive, or solvent using EPA Method 311. Such information may include, but not be limited to, separation column, oven temperature, carrier gas, injection port temperature, extraction solvent, and internal standard.

4. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the coatings and cleanup materials.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Laminating and Plybending (Z006)

Activity Description: Laminated materials are attached to furniture with glue.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
laminating and plybending (adhesive operations) with roll coating for wood furniture	OAC rule 3745-21-07(G)(2)	none (See A.II.1.)
	40 CFR 63.802(a)(2)(ii)	1.0 lb volatile hazardous air pollutant (VHAP)/lb solids, as applied, for contact adhesives
	40 CFR 60.803	Prepare and maintain a work practice implementation plan (see section A.2.a. in Part II).

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The permittee shall not employ any adhesive or cleanup material in this emissions unit which is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

2. The permittee shall only use coating materials in this emissions unit that comply with the applicable VHAP emission limitation in section A.I.1. on an "as applied" basis.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain the following information each day for this emissions unit:

a. the company identification for each adhesive material employed;

b. documentation on whether or not each adhesive material employed is a photochemically reactive material;

c. the company identification for each cleanup material employed; and

d. documentation on whether or not each cleanup material employed is a photochemically reactive material.

III. Monitoring and/or Record Keeping Requirements (continued)

2. In order to demonstrate compliance with the VHAP limit specified in section A.I.1., the permittee shall maintain records of the following information for each contact adhesive:

a. a certified product data sheet; and

b. the VHAP content, in lbs VHAP/lb solids, as applied.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which a foam adhesive or cleanup material classified as a photochemically reactive material was employed, and include a copy of the documentation for each such photochemically reactive material.

The quarterly deviation reports shall be submitted in accordance with paragraph A.1.c. of the Part I - General Terms and Conditions of this permit.

2. Regarding the VHAP emission limitations in section A.I.1., the permittee shall submit semiannual compliance certification reports which state that compliant coating materials have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The emissions unit is in violation of the applicable VHAP emissions limit whenever a noncompliant coating material, as demonstrated by records or by a sample of the coating material, is used. If the emissions unit was in noncompliance, the permittee shall state the measures that were taken to bring the emissions unit into compliance.

The semiannual compliance certification reports shall be submitted within 30 days after each six-month period to the Ohio EPA Northwest District Office. The six-month periods are January through June and July through December.

V. Testing Requirements

1. Compliance with the emission limitation in section A.I.1 of these terms and conditions shall be determined in accordance with the following method:

Emission Limitation:
1.0 lb volatile hazardous air pollutant (VHAP)/lb solids, as applied, for contact adhesives

Applicable Compliance Method:
The permittee shall demonstrate compliance with the VHAP emissions limit by means of the record keeping in section A.III.2. and the procedures in sections A.V.2. and A.V.3.

2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating or solvent shall be determined in accordance with the following:

a. EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. Method 311 shall then be used to quantify those VHAP identified through formulation data. Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during cure. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. EPA Method 24 (40 CFR part 60, appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Ohio EPA that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. In the event of any inconsistency between Method 24 or Method 311 test data and a facility's formulation data, that is, if the Method 24/311 value is higher, the Method 24/311 test shall govern unless after consultation, the permittee could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA- 340/1-91-010.

V. Testing Requirements (continued)

b. The permittee may request approval from the USEPA Administrator to use an alternative method for determining the VHAP content of the coating.

3. Certified product data sheet (CPDS) means documentation furnished by coating or adhesive suppliers or an outside laboratory that provides:

a. The VHAP content of a finishing material, contact adhesive, or solvent, by percent weight, measured using the EPA Method 311, or an equivalent or alternative method (or formulation data if the coating meets the criteria specified in section A.V.2.a.);

b. The solids content of a finishing material or contact adhesive by percent weight, determined using data from the EPA Method 24, or an alternative or equivalent method (or formulation data if the coating meets the criteria specified in section A.V.2.a.); and

c. The density, measured by EPA Method 24 or an alternative or equivalent method.

Therefore, the reportable VHAP content shall represent the maximum aggregate emissions potential of the finishing material, adhesive, or solvent in concentrations greater than or equal to 1.0 percent by weight or 0.1 percent for VHAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), as formulated. Only VHAP present in concentrations greater than or equal to 1.0 percent by weight, or 0.1 percent for VHAP that are carcinogens, must be reported on the CPDS. The purpose of the CPDS is to assist the permittee in demonstrating compliance with the emission limitations on volatile hazardous air pollutants.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Woodworking and Wood Waste Handling (Z007)

Activity Description: Wood milling and sanding operations are performed in this area. Also, wood waste from the milling and sanding operations is conveyed, ground, and loaded out in this area.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
woodworking and wood waste handling w/ baghouse	OAC rule 3745-17-11(B)	none (See A.I.2.a.)
	OAC rule 3745-17-07(A)	none (See A.I.2.b.)

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply since the facility is located in Williams County, which is identified as a P-2 county.

2.b This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because OAC rule 3745-17-11 is not applicable.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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