OhioEPA

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
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P.O. Box 1049
Columbus, OH 43216-1049

07/31/01

RE: Proposed Title V Chapter 3745-77 Permit

02-38-00-0136
Merillat Industries

Attn: Genevieve Damico AR-18J
United States Enviromental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for Merillat Industries, has been created in Ohio EPA's State Air Resources System (STARS) on 07/31/01, for review by USEPA. This proposed action is identified in STARS as 3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact Mike Ahern, DAPC Permit Management Unit supervisor at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Thomas G. Rigo

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

cc: Northeast District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 07/31/01	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: 02-38-00-0136 to:
Merillat Industries
One Merillat Court
Loudonville, OH 44842

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

K001 (Stain Line #1,2,3)
Surface coating line applying toner/stain coatings with hand application.

K004 (Sealer & Topcoat Line # 1)
Surface coating line applying sealer/topcoat coating with rotary spray application.

K005 (Sealer & Topcoat Line # 2)
Surface coating line applying sealer/topcoat coating with rotary spray application.

K007 (Specialty Finishing System)
Surface coating line applying toner/stain and sealer/topcoat coatings. (hand app.)

K009 (Test Booth)
Booth applying toner/stain and sealer/topcoat to wood cabinetry components.

P001 (Machining Wood Parts For Cabinet Production)
Particleboard, Fiber Board and Solid Wood pieces will be machined to make components for the assembly of cabinets.

P002 (Machining Wood Parts For Cabinet Production)
Particleboard, Fiber Board and Solid Wood pieces will be machined to make components for the assembly of cabinets.

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 3745-77-04(A) 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:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping 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.

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.

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 recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping 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 of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and 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.8 below if no deviations occurred during the quarter.
iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, 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, recordkeeping, 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.

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.

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, 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. (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 upsets.

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 emission unit(s) that is (are) served by such control system(s).

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.

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.

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.

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. 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.

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.

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.

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.

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 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.

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.

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 appropriate Ohio EPA District Office or local air agency 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.

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.

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).

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.

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, 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 further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

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.

18. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

B. State Only Enforceable Section

1. 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.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. 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

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

Z001 Distillation unit
Z003 King air make-up and air rotation unit @ B-24
Z004 King air make-up and air rotation unit @ C-12
Z005 King air make-up and air rotation unit @ A-2
Z006 King air make-up and air rotation unit @ 1-3
Z007 216 hp diesel fire pump
Z008 Emergency generator
Z009 Emergency generator
Z010 30-gal. parts washer
T001 5000-gal. finishing material storage tank
T002 5000-gal. finishing material storage tank
T003 5000-gal. finishing material storage tank
T004 1200-gal. solvent storage tank

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

2. The following emissions units were included in the permit application, but have not been installed at the facility:

K006 Roll coating line
K008 Specialty finishing system
K010 Specialty finishing system

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Stain Line #1,2,3 (K001)

Activity Description: Surface coating line applying toner/stain coatings with hand 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
K001 - conveyor system consisting of 4 coating booths and a flash-off oven, all controlled by a building enclosure and thermal oxidizer, for the application of stains and toners to wood cabinets.	OAC rule 3745-31-05(A)(3) PTI 02-14155 as modified May 2001	See A.I.2.a through A.I.2.d below.
	OAC rule 3745-21-07(G)(2)	The requirements of this rule are less stringent than the requirements established pursuant to OAC Rule 3745-31-05(A)(3).
	NESHAP (40 CFR 63, subpart JJ, 63.800 (b))	See A.I.2.e below.

2. Additional Terms and Conditions

2.a Volatile organic compound (VOC) emissions from all coatings and cleanup materials shall not exceed 1008 pounds per day from emissions units K001, K004, K005, K007 and K009, combined.

2.b Volatile organic compound emissions from all coatings and cleanup materials shall not exceed 153.3 tons per year from emissions units K001, K004, K005, K007 and K009, combined.

2.c The building enclosure shall be designed and operated as a permanent total enclosure as defined by US EPA Method 204. The use of this building enclosure, as defined in Reference Method 204, shall ensure 100% capture of all the organic compound emissions of VOC emissions and thus shall be assumed to capture 100% of OC emissions.

2. Additional Terms and Conditions (continued)

2.d The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee shall comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see Sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

2.e The permittee shall employ an incineration system to control the Organic Compound (OC) emissions from the permanent total enclosure. The incinerator system shall have an OC destruction efficiency of at least 90%, by weight.

2.f If the facility's emissions of hazardous air pollutants (HAPs) exceeds 5 tons per rolling, 12-month period for any individual HAP or 12.5 tons per rolling, 12-month period for the total, combined HAPs, this facility becomes a major source and must comply with the requirements of 40 CFR Part 63, Subpart JJ, within 365 days after the exceedance. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA Northeast District Office.

II. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

3. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the thermal incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:

a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;

b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;

c. the average facial velocity (FV) of air through all the NDO's shall be at least 3,600 m/hr (200 fpm), as a 3 hour average;

d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water, as a 3 hour average;

e. the direction of air flow through all NDO's shall be into the enclosure;

f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and

g. all OC emissions from the coating line must be captured and contained for discharge to the thermal incinerator.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.

2. The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the combustion temperature. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

4. The permittee shall collect and record the following information for each day for the control equipment:

a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;

b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance; and

c. all 3-hour blocks of time during which the average static pressure differential across the building enclosure was less than the 0.007 inch water, when the emissions unit was in operation.

5. The permittee shall collect and record the following information each day for emissions units K001, K004, K005, K007 and K009, combined:

a. the company identification for each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the VOC content of each coating and cleanup material, in pounds per gallon; and

d. the total controlled VOC emissions rate for all coatings and cleanup materials, in pounds per day (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

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

6. The permittee shall collect and record the following information each month for all emissions units at the facility:

a. the name and identification number of each coating, as applied;

b. the individual HAP * content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);

d. the number of gallons of each coating employed;

e. the name and identification of each cleanup material employed;

f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);

h. the number of gallons of each cleanup material employed;

i. the total, controlled individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month (for each HAP, the sum of b times d for each coating plus the sum of f times h for each cleanup material for the previous month, multipled by 1 minus the overall control efficiency from the most recent performance test that demonstrated that the emissions units were in compliance);

j. the total, controlled individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per rolling, 12-month period (for each HAP, the sum of i. for the previous 12 months);

k. the total, controlled combined HAPs emissions from all coatings and cleanup materials employed, in tons per month (the sum of c times d for each coating plus the sum of g times h for each cleanup material for the previous month, multiplied by 1 minus the overall control efficiency from the most recent performance test that demonstrated that the emissions units were in compliance); and

l. the total, controlled combined combined HAPs emissions from all coatings and cleanup materials employed, in tons per rolling, 12-month period (the sum of k. for the previous 12-month period).

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA Northeast District Office contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

IV. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify any daily record showing that the emissions of VOC from emissions units K001, K004, K005, K007 and K009, combined, exceeded the daily emission limit specified above.

3. The permittee shall submit quarterly deviation (excursion) reports which identify any record showing that the pressure drop across the building enclosure was less than 0.007 inch of water, as a 3-hour average, when the emissions unit was in operation.

IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

5. The permittee shall submit quarterly summary reports which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

6. The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

7. The permittee shall submit annual reports which specify the following information for the previous calendar year:

a. the total, controlled VOC emissions from emissions units K001, K004, K005, K007 and K009, combined;

b. the total, controlled emissions of each individual HAP from emissions units K001, K004, K005, K007 and K009, combined; and

c. the total, controlled emissions of total combined HAPs from emissions units K001, K004, K005, K007 and K009, combined.

These reports shall be submitted by January 31 of each year.

8. The permittee shall notify this office within 30 days of the first monthly record that shows the facility emitted more than 5 tons of a single HAP per rolling, 12 month period or more than 12.5 tons of combined HAPs per rolling, 12-month period.

V. Testing Requirements

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

1.a Emissions Limitation:
1008 pounds per day of VOC emissions from emissions units K001, K004, K005, K007 and K009, combined.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section A.III.5.d.

1.b Emissions Limitation:
153.3 tons per year of VOC emissions from emissions units K001, K004, K005, K007 and K009, combined.

Applicable Compliance Method:
Compliance shall be based on Section A.III.5 and shall be the sum of the 365 daily emission rates for the calendar year.

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

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing of the control device shall be conducted 2.5 years after the issuance of the final operating permit. The building enclosure shall be tested to verify permanent total enclosure within six months after the issuance of the final permit.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds and the ninety (90) percent destruction efficiency requirement for the thermal incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the thermal incinerator: Method 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

e. The test shall be conducted while all the emissions units are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA, Northeast District Office.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

g. Personnel from the Ohio EPA, Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.

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
K001 - conveyor system consisting of 4 coating booths and a flash-off oven, all controlled by a building enclosure and thermal oxidizer, for the application of stains and toners to wood cabinets.		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit, K001, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

1.a Pollutant: Acetone

TLV (mg/m3): 1780

Maximum Hourly Emission Rate (lbs/hr): 7.51

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 52.4

MAGLC (ug/m3): 4238

1.b Pollutant: Ethyl benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 1.86

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12.9

MAGLC (ug/m3): 1033

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

1.c Pollutant: Isobutyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 6.00

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 41.9

MAGLC (ug/m3): 1698

1.d Pollutant: Isopropyl acetate

TLV (mg/m3): 1040

Maximum Hourly Emission Rate (lbs/hr): 5.10

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 35.6

MAGLC (ug/m3): 2476

1.e Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 2.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.9

MAGLC (ug/m3): 2340

1.f Pollutant: Metyl n-amyl ketone

TLV (mg/m3): 233

Maximum Hourly Emission Rate (lbs/hr): 3.67

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 25.6

MAGLC (ug/m3): 555

1.g Pollutant: Methyl propyl ketone

TLV (mg/m3): 705

Maximum Hourly Emission Rate (lbs/hr): 1.92

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 13.4

MAGLC (ug/m3): 1679

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

1.h Pollutant: Stoddard solvent

TLV (mg/m3): 525

Maximum Hourly Emission Rate (lbs/hr):7.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 50.6

MAGLC (ug/m3): 1250

1.i Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 1.14

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7.94

MAGLC (ug/m3): 448

1.j Pollutant: 1,2,4-Trimethyl benzene

TLV (mg/m3): 123

Maximum Hourly Emission Rate (lbs/hr): 3.83

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 26.8

MAGLC (ug/m3): 293

1.k Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 8.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 57.0

MAGLC (ug/m3): 1033

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Sealer & Topcoat Line # 1 (K004)

Activity Description: Surface coating line applying sealer/topcoat coating with rotary spray 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
K004 - conveyor system consisting of Cefla spray booth and flash-off oven all controlled by a building enclosure and thermal oxidizer, for the application of sealer and topcoat to wood cabinets.	OAC rule 3745-31-05(A)(3) PTI 02-14155 as modified May 2001	See A.I.2.a through A.I.2.d below.
	OAC Rule 3745-21-07(G)(2)	The requirements of this rule are less stringent than the requirements established pursuant to OAC Rule 3745-31-05(A)(3).
	NESHAP (40 CFR 63, subpart JJ, 63.800 (b))	See A.I.2.e below.

2. Additional Terms and Conditions

2.a Volatile organic compound (VOC) emissions from all coatings and cleanup materials shall not exceed 1008 pounds per day from emissions units K001, K004, K005, K007, and K009, combined.

2.b Volatile organic compound emissions from all coatings and cleanup materials shall not exceed 153.3 tons per year from emissions units K001, K004, K005, K007 and K009, combined.

2.c The building enclosure shall be designed and operated as a permanent total enclosure as defined by US EPA Method 204. The use of this building enclosure, as defined in Reference Method 204, shall ensure 100% capture of all the organic compound emissions of VOC emissions and thus shall be assumed to capture 100% of OC emissions.

2. Additional Terms and Conditions (continued)

2.d The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee shall comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see Sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

2.e The permittee shall employ an incineration system to control the Organic Compound (OC) emissions from the permanent total enclosure. The incinerator system shall have an OC destruction efficiency of at least 90%, by weight.

2.f If the facility's emissions of hazardous air pollutants (HAPs) exceeds 5 tons per rolling, 12-month period for any individual HAP or 12.5 tons per rolling, 12-month period for the total, combined HAPs, this facility becomes a major source and must comply with the requirements of 40 CFR Part 63, Subpart JJ, within 365 days after the exceedance. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA Northeast District Office.

II. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

3. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the thermal incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:

a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;

b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;

c. the average facial velocity (FV) of air through all the NDO's shall be at least 3,600 m/hr (200 fpm), as a 3 hour average;

d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water, as a 3 hour average;

e. the direction of air flow through all NDO's shall be into the enclosure;

f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and

g. all OC emissions from the coating line must be captured and contained for discharge to the thermal incinerator.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.

2. The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the combustion temperature. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

4. The permittee shall collect and record the following information for each day for the control equipment:

a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;

b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance; and

c. all 3-hour blocks of time during which the average static pressure differential across the building enclosure was less than the 0.007 inch water, when the emissions unit was in operation.

5. The permittee shall collect and record the following information each day for emissions units K001, K004, K005, K007 and K009, combined:

a. the company identification for each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the VOC content of each coating and cleanup material, in pounds per gallon; and

d. the total controlled VOC emissions rate for all coatings and cleanup materials, in pounds per day (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

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

6. The permittee shall collect and record the following information each month for all emissions units at the facility:

a. the name and identification number of each coating, as applied;

b. the individual HAP * content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);

d. the number of gallons of each coating employed;

e. the name and identification of each cleanup material employed;

f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);

h. the number of gallons of each cleanup material employed;

i. the total, controlled individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month (for each HAP, the sum of b times d for each coating plus the sum of f times h for each cleanup material for the previous month, multipled by 1 minus the overall control efficiency from the most recent performance test that demonstrated that the emissions units were in compliance);

j. the total, controlled individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per rolling, 12-month period (for each HAP, the sum of i. for the previous 12 months);

k. the total, controlled combined HAPs emissions from all coatings and cleanup materials employed, in tons per month (the sum of c times d for each coating plus the sum of g times h for each cleanup material for the previous month, multiplied by 1 minus the overall control efficiency from the most recent performance test that demonstrated that the emissions units were in compliance); and

l. the total, controlled combined combined HAPs emissions from all coatings and cleanup materials employed, in tons per rolling, 12-month period (the sum of k. for the previous 12-month period).

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA Northeast District Office contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

IV. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify any daily record showing that the emissions of VOC from emissions units K001, K004, K005, K007 and K009, combined, exceeded the daily emission limit specified above.

3. The permittee shall submit quarterly deviation (excursion) reports which identify any record showing that the pressure drop across the building enclosure was less than 0.007 inch of water, as a 3-hour average, when the emissions unit was in operation.

IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

5. The permittee shall submit quarterly summary reports which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

6. The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

7. The permittee shall submit annual reports which specify the following information for the previous calendar year:

a. the total, controlled VOC emissions from emissions units K001, K004, K005, K007 and K009, combined;

b. the total, controlled emissions of each individual HAP from emissions units K001, K004, K005, K007 and K009, combined; and

c. the total, controlled emissions of total combined HAPs from emissions units K001, K004, K005, K007 and K009, combined.

These reports shall be submitted by January 31 of each year.

8. The permittee shall notify this office within 30 days of the first monthly record that shows the facility emitted more than 5 tons of a single HAP per rolling, 12 month period or more than 12.5 tons of combined HAPs per rolling, 12-month period.

V. Testing Requirements

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

1.a Emissions Limitation:
1008 pounds per day of VOC emissions from emissions units K001, K004, K005, K007 and K009, combined.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section A.III.5.d.

1.b Emissions Limitation:
153.3 tons per year of VOC emissions from emissions units K001, K004, K005, K007 and K009, combined.

Applicable Compliance Method:
Compliance shall be based on Section A.III.5 and shall be the sum of the 365 daily emission rates for the calendar year.

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

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing of the control device shall be conducted 2.5 years after the issuance of the final operating permit. The building enclosure shall be tested to verify permanent total enclosure within six months after the issuance of the final permit.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds and the ninety (90) percent destruction efficiency requirement for the thermal incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the thermal incinerator: Method 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

e. The test shall be conducted while all the emissions units are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA, Northeast District Office.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

g. Personnel from the Ohio EPA, Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.

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
K004 - conveyor system consisting of Cefla spray booth and flash-off oven all controlled by a building enclosure and thermal oxidizer, for the application of sealer and topcoat to wood cabinets.		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit, K004, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

1.a Pollutant: Acetone

TLV (mg/m3): 1780

Maximum Hourly Emission Rate (lbs/hr): 7.51

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 52.4

MAGLC (ug/m3): 4238

1.b Pollutant: Ethyl benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 1.86

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12.9

MAGLC (ug/m3): 1033

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

1.c Pollutant: Isobutyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 6.00

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 41.9

MAGLC (ug/m3): 1698

1.d Pollutant: Isopropyl acetate

TLV (mg/m3): 1040

Maximum Hourly Emission Rate (lbs/hr): 5.10

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 35.6

MAGLC (ug/m3): 2476

1.e Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 2.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.9

MAGLC (ug/m3): 2340

1.f Pollutant: Metyl n-amyl ketone

TLV (mg/m3): 233

Maximum Hourly Emission Rate (lbs/hr): 3.67

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 25.6

MAGLC (ug/m3): 555

1.g Pollutant: Methyl propyl ketone

TLV (mg/m3): 705

Maximum Hourly Emission Rate (lbs/hr): 1.92

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 13.4

MAGLC (ug/m3): 1679

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

1.h Pollutant: Stoddard solvent

TLV (mg/m3): 525

Maximum Hourly Emission Rate (lbs/hr):7.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 50.6

MAGLC (ug/m3): 1250

1.i Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 1.14

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7.94

MAGLC (ug/m3): 448

1.j Pollutant: 1,2,4-Trimethyl benzene

TLV (mg/m3): 123

Maximum Hourly Emission Rate (lbs/hr): 3.83

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 26.8

MAGLC (ug/m3): 293

1.k Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 8.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 57.0

MAGLC (ug/m3): 1033

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Sealer & Topcoat Line # 2 (K005)

Activity Description: Surface coating line applying sealer/topcoat coating with rotary spray 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
K005 - conveyor system consisting of a Cefla spray booth and flash-off oven all controlled by a building enclosure and thermal oxidizer, for the application of sealer and topcoat to wood cabinets.	OAC rule 3745-31-05(A)(3) PTI 02-14155 as modified May 2001	See A.I.2.a through A.I.2.d below.
	OAC Rule 3745-21-07(G)(2)	The requirements of this rule are less stringent than the requirements established pursuant to OAC Rule 3745-31-05(A)(3).
	NESHAP (40 CFR 63, subpart JJ, 63.800 (b))	See A.I.2.e below.

2. Additional Terms and Conditions

2.a Volatile organic compound (VOC) emissions from all coatings and cleanup materials shall not exceed 1008 pounds per day from emissions units K001, K004, K005, K007, and K009, combined.

2.b Volatile organic compound emissions from all coatings and cleanup materials shall not exceed 153.3 tons per year from emissions units K001, K004, K005, K007 and K009, combined.

2.c The building enclosure shall be designed and operated as a permanent total enclosure as defined by US EPA Method 204. The use of this building enclosure, as defined in Reference Method 204, shall ensure 100% capture of all the organic compound emissions of VOC emissions and thus shall be assumed to capture 100% of OC emissions.

2. Additional Terms and Conditions (continued)

2.d The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee shall comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see Sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

2.e The permittee shall employ an incineration system to control the Organic Compound (OC) emissions from the permanent total enclosure. The incinerator system shall have an OC destruction efficiency of at least 90%, by weight.

2.f If the facility's emissions of hazardous air pollutants (HAPs) exceeds 5 tons per rolling, 12-month period for any individual HAP or 12.5 tons per rolling, 12-month period for the total, combined HAPs, this facility becomes a major source and must comply with the requirements of 40 CFR Part 63, Subpart JJ, within 365 days after the exceedance. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA Northeast District Office.

II. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

3. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the thermal incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:

a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;

b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;

c. the average facial velocity (FV) of air through all the NDO's shall be at least 3,600 m/hr (200 fpm), as a 3 hour average;

d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water, as a 3 hour average;

e. the direction of air flow through all NDO's shall be into the enclosure;

f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and

g. all OC emissions from the coating line must be captured and contained for discharge to the thermal incinerator.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.

2. The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the combustion temperature. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

4. The permittee shall collect and record the following information for each day for the control equipment:

a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;

b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance; and

c. all 3-hour blocks of time during which the average static pressure differential across the building enclosure was less than the 0.007 inch water, when the emissions unit was in operation.

5. The permittee shall collect and record the following information each day for emissions units K001, K004, K005, K007 and K009, combined:

a. the company identification for each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the VOC content of each coating and cleanup material, in pounds per gallon; and

d. the total controlled VOC emissions rate for all coatings and cleanup materials, in pounds per day (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

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

6. The permittee shall collect and record the following information each month for all emissions units at the facility:

a. the name and identification number of each coating, as applied;

b. the individual HAP * content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);

d. the number of gallons of each coating employed;

e. the name and identification of each cleanup material employed;

f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);

h. the number of gallons of each cleanup material employed;

i. the total, controlled individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month (for each HAP, the sum of b times d for each coating plus the sum of f times h for each cleanup material for the previous month, multipled by 1 minus the overall control efficiency from the most recent performance test that demonstrated that the emissions units were in compliance);

j. the total, controlled individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per rolling, 12-month period (for each HAP, the sum of i. for the previous 12 months);

k. the total, controlled combined HAPs emissions from all coatings and cleanup materials employed, in tons per month (the sum of c times d for each coating plus the sum of g times h for each cleanup material for the previous month, multiplied by 1 minus the overall control efficiency from the most recent performance test that demonstrated that the emissions units were in compliance); and

l. the total, controlled combined combined HAPs emissions from all coatings and cleanup materials employed, in tons per rolling, 12-month period (the sum of k. for the previous 12-month period).

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA Northeast District Office contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

IV. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify any daily record showing that the emissions of VOC from emission units K001, K004, K005, K007 and K009, combined, exceeded the daily emission limit specified above.

3. The permittee shall submit quarterly deviation (excursion) reports which identify any record showing that the pressure drop across the building enclosure was less than 0.007 inch of water, as a 3-hour average, when the emissions unit was in operation.

IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

5. The permittee shall submit quarterly summary reports which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

6. The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

7. The permittee shall submit annual reports which specify the following information for the previous calendar year:

a. the total, controlled VOC emissions from emissions units K001, K004, K005, K007 and K009, combined;

b. the total, controlled emissions of each individual HAP from emissions units K001, K004, K005, K007 and K009, combined; and

c. the total, controlled emissions of total combined HAPs from emissions units K001, K004, K005, K007 and K009, combined.

These reports shall be submitted by January 31 of each year.

8. The permittee shall notify this office within 30 days of the first monthly record that shows the facility emitted more than 5 tons of a single HAP per rolling, 12 month period or more than 12.5 tons of combined HAPs per rolling, 12-month period.

V. Testing Requirements

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

1.a Emissions Limitation:
1008 pounds per day of VOC emissions from emissions units K001, K004, K005, K007 and K009, combined.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section A.III.5.d.

1.b Emissions Limitation:
153.3 tons per year of VOC emissions from emissions units K001, K004, K005, K007 and K009, combined.

Applicable Compliance Method:
Compliance shall be based on Section A.III.5 and shall be the sum of the 365 daily emission rates for the calendar year.

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

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing of the control device shall be conducted 2.5 years after the issuance of the final operating permit. The building enclosure shall be tested to verify permanent total enclosure within six months after the issuance of the final permit.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds and the ninety (90) percent destruction efficiency requirement for the thermal incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the thermal incinerator: Method 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

e. The test shall be conducted while all the emissions units are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA, Northeast District Office.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

g. Personnel from the Ohio EPA, Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.

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
K005 - conveyor system consisting of a Cefla spray booth and flash-off oven all controlled by a building enclosure and thermal oxidizer, for the application of sealer and topcoat to wood cabinets.		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit, K005, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

1.a Pollutant: Acetone

TLV (mg/m3): 1780

Maximum Hourly Emission Rate (lbs/hr): 7.51

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 52.4

MAGLC (ug/m3): 4238

1.b Pollutant: Ethyl benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 1.86

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12.9

MAGLC (ug/m3): 1033

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

1.c Pollutant: Isobutyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 6.00

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 41.9

MAGLC (ug/m3): 1698

1.d Pollutant: Isopropyl acetate

TLV (mg/m3): 1040

Maximum Hourly Emission Rate (lbs/hr): 5.10

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 35.6

MAGLC (ug/m3): 2476

1.e Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 2.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.9

MAGLC (ug/m3): 2340

1.f Pollutant: Metyl n-amyl ketone

TLV (mg/m3): 233

Maximum Hourly Emission Rate (lbs/hr): 3.67

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 25.6

MAGLC (ug/m3): 555

1.g Pollutant: Methyl propyl ketone

TLV (mg/m3): 705

Maximum Hourly Emission Rate (lbs/hr): 1.92

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 13.4

MAGLC (ug/m3): 1679

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

1.h Pollutant: Stoddard solvent

TLV (mg/m3): 525

Maximum Hourly Emission Rate (lbs/hr):7.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 50.6

MAGLC (ug/m3): 1250

1.i Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 1.14

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7.94

MAGLC (ug/m3): 448

1.j Pollutant: 1,2,4-Trimethyl benzene

TLV (mg/m3): 123

Maximum Hourly Emission Rate (lbs/hr): 3.83

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 26.8

MAGLC (ug/m3): 293

Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 8.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 57.0

MAGLC (ug/m3): 1033

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Specialty Finishing System (K007)

Activity Description: Surface coating line applying toner/stain and sealer/topcoat coatings. (hand app.)

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
K007 - conveyor system with two spray booths and flash-off oven controlled by a building enclosure and thermal oxidizer, for the application of toners, stains, sealers and topcoats to wood cabinets.	OAC rule 3745-31-05(A)(3) PTI 02-14155 as modified May 2001	See A.I.2.a through A.I.2.d below.
	OAC Rule 3745-21-07(G)(2)	The requirements of this rule are less stringent than the requirements established pursuant to OAC Rule 3745-31-05(A)(3).
	NESHAP (40 CFR 63, subpart JJ, 63.800 (b))	See I.A.2.e below.

2. Additional Terms and Conditions

2.a Volatile organic compound (VOC) emissions from all coatings and cleanup materials shall not exceed 1008 pounds per day from emissions units K001, K004, K005, K007, and K009, combined.

2.b Volatile organic compound (VOC) emissions from all coatings and cleanup materials shall not exceed 153.3 tons per year from emissions units K001, K004, K005, K007 and K009, combined.

2.c The building enclosure shall be designed and operated as a permanent total enclosure as defined by US EPA Method 204. The use of this building enclosure, as defined in Reference Method 204, shall ensure 100% capture of all the organic compound emissions of VOC emissions and thus shall be assumed to capture 100% of OC emissions.

2. Additional Terms and Conditions (continued)

2.d The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee shall comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see Sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

2.e The permittee shall employ an incineration system to control the Organic Compound (OC) emissions from the permanent total enclosure. The incinerator system shall have an OC destruction efficiency of at least 90%, by weight.

2.f If the facility's emissions of hazardous air pollutants (HAPs) exceeds 5 tons per rolling, 12-month period for any individual HAP or 12.5 tons per rolling, 12-month period for the total, combined HAPs, this facility becomes a major source and must comply with the requirements of 40 CFR Part 63, Subpart JJ, within 365 days after the exceedance. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA Northeast District Office.

II. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

3. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the thermal incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:

a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;

b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;

c. the average facial velocity (FV) of air through all the NDO's shall be at least 3,600 m/hr (200 fpm), as a 3 hour average;

d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water, as a 3 hour average;

e. the direction of air flow through all NDO's shall be into the enclosure;

f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and

g. all OC emissions from the coating line must be captured and contained for discharge to the thermal incinerator.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.

2. The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the combustion temperature. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

4. The permittee shall collect and record the following information for each day for the control equipment:

a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;

b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance; and

c. all 3-hour blocks of time during which the average static pressure differential across the building enclosure was less than the 0.007 inch water, when the emissions unit was in operation.

5. The permittee shall collect and record the following information each day for emissions units K001, K004, K005, K007 and K009, combined:

a. the company identification for each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the VOC content of each coating and cleanup material, in pounds per gallon; and

d. the total controlled VOC emissions rate for all coatings and cleanup materials, in pounds per day (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

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

6. The permittee shall collect and record the following information each month for all emissions units at the facility:

a. the name and identification number of each coating, as applied;

b. the individual HAP * content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);

d. the number of gallons of each coating employed;

e. the name and identification of each cleanup material employed;

f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);

h. the number of gallons of each cleanup material employed;

i. the total, controlled individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month (for each HAP, the sum of b times d for each coating plus the sum of f times h for each cleanup material for the previous month, multipled by 1 minus the overall control efficiency from the most recent performance test that demonstrated that the emissions units were in compliance);

j. the total, controlled individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per rolling, 12-month period (for each HAP, the sum of i. for the previous 12 months);

k. the total, controlled combined HAPs emissions from all coatings and cleanup materials employed, in tons per month (the sum of c times d for each coating plus the sum of g times h for each cleanup material for the previous month, multiplied by 1 minus the overall control efficiency from the most recent performance test that demonstrated that the emissions units were in compliance); and

l. the total, controlled combined combined HAPs emissions from all coatings and cleanup materials employed, in tons per rolling, 12-month period (the sum of k. for the previous 12-month period).

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA Northeast District Office contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

IV. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify any daily record showing that the emissions of VOC from emissions units K001, K004, K005, K007 and K009, combined, exceeded the daily emission limit specified above.

3. The permittee shall submit quarterly deviation (excursion) reports which identify any record showing that the pressure drop across the building enclosure was less than 0.007 inch of water, as a 3-hour average, when the emissions unit was in operation.

IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

5. The permittee shall submit quarterly summary reports which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

6. The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

7. The permittee shall also submit annual reports which specify the following information for the previous calendar year:

a. the total, controlled VOC emissions from emissions units K001, K004, K005, K007 and K009, combined;

b. the total, controlled emissions of each individual HAP from emissions units K001, K004, K005, K007 and K009, combined; and

c. the total, controlled emissions of total combined HAPs from emissions units K001, K004, K005, K007 and K009, combined.

These reports shall be submitted by January 31 of each year.

8. The permittee shall notify this office within 30 days of the first monthly record that shows the facility emitted more than 5 tons of a single HAP per rolling, 12 month period or more than 12.5 tons of combined HAPs per rolling, 12-month period.

V. Testing Requirements

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

1.a Emissions Limitation:
1008 pounds per day of VOC emissions from emissions units K001, K004, K005, K007 and K009, combined.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section A.III.5.d.

1.b Emissions Limitation:
153.3 tons per year of VOC emissions from emissions units K001, K004, K005, K007 and K009, combined.

Applicable Compliance Method:
Compliance shall be based on Section A.III.5 and shall be the sum of the 365 daily emission rates for the calendar year.

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

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing of the control device shall be conducted 2.5 years after the issuance of the final operating permit. The building enclosure shall be tested to verify permanent total enclosure within six months after the issuance of the final permit.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds and the ninety (90) percent destruction efficiency requirement for the thermal incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the thermal incinerator: Method 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

e. The test shall be conducted while all the emissions units are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA, Northeast District Office.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

g. Personnel from the Ohio EPA, Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.

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
K007 - conveyor system with two spray booths and flash-off oven controlled by a building enclosure and thermal oxidizer, for the application of toners, stains, sealers and topcoats to wood cabinets.		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit, K007, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

1.a Pollutant: Acetone

TLV (mg/m3): 1780

Maximum Hourly Emission Rate (lbs/hr): 7.51

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 52.4

MAGLC (ug/m3): 4238

1.b Pollutant: Ethyl benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 1.86

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12.9

MAGLC (ug/m3): 1033

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

1.c Pollutant: Isobutyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 6.00

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 41.9

MAGLC (ug/m3): 1698

1.d Pollutant: Isopropyl acetate

TLV (mg/m3): 1040

Maximum Hourly Emission Rate (lbs/hr): 5.10

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 35.6

MAGLC (ug/m3): 2476

1.e Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 2.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.9

MAGLC (ug/m3): 2340

1.f Pollutant: Metyl n-amyl ketone

TLV (mg/m3): 233

Maximum Hourly Emission Rate (lbs/hr): 3.67

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 25.6

MAGLC (ug/m3): 555

1.g Pollutant: Methyl propyl ketone

TLV (mg/m3): 705

Maximum Hourly Emission Rate (lbs/hr): 1.92

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 13.4

MAGLC (ug/m3): 1679

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

1.h Pollutant: Stoddard solvent

TLV (mg/m3): 525

Maximum Hourly Emission Rate (lbs/hr):7.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 50.6

MAGLC (ug/m3): 1250

1.i Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 1.14

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7.94

MAGLC (ug/m3): 448

1.j Pollutant: 1,2,4-Trimethyl benzene

TLV (mg/m3): 123

Maximum Hourly Emission Rate (lbs/hr): 3.83

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 26.8

MAGLC (ug/m3): 293

1.k Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 8.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 57.0

MAGLC (ug/m3): 1033

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Test Booth (K009)

Activity Description: Booth applying toner/stain and sealer/topcoat to wood cabinetry components.

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
K009 - Test booth consisting of two coating booths and a flash-off oven all controlled by the building enclosure and thermal oxidizer, for the application of toners, stains, sealers and topcoats to wood.	OAC Rule 3745-31-05(A)(3) PTI 02-14155 as modified May 2001	See A.I.2.a through A.I.2.d below.
	OAC Rule 3745-21-07(G)(2)	The requirements of this rule are less stringent than the requirements established pursuant to OAC Rule 3745-31-05(A)(3).
	NESHAP (40 CFR 63, subpart JJ, 63.800 (b))	See A.I.2.e below.

2. Additional Terms and Conditions

2.a Volatile organic compound (VOC) emissions from all coatings and cleanup materials shall not exceed 153.3 tons per year from emissions units K001, K004, K005, K007 and K009, combined.

2.b Volatile organic compound emissions from all coatings and cleanup materials shall not exceed 153.3 tons per rolling, 12-month period from emissions units K001, K004, K005, K007 and K009, combined.

2.c The building enclosure shall be designed and operated as a permanent total enclosure as defined by US EPA Method 204. The use of this building enclosure, as defined in Reference Method 204, shall ensure 100% capture of all the organic compound emissions of VOC emissions and thus shall be assumed to capture 100% of OC emissions.

2. Additional Terms and Conditions (continued)

2.d The permittee has the option to perform an additional demonstration to show that the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation (i.e., the air flow through the PTE to the control device was always maintained under negative pressure even when all additional egress points (non-natural draft openings) which could affect the PTE were opened) in lieu of installing, maintaining and operating monitoring devices and a recorder which simultaneously measure and record the pressure inside and outside the PTE.

If the PTE can not be compromised, under normal plant conditions, when the emissions unit is in operation, the permittee will not be required to comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below to ensure the ongoing integrity of the PTE.

If the permittee elects not to perform the additional demonstration to show that the PTE can not be compromised or the additional demonstration indicates that the PTE can be compromised, the permittee shall comply with the differential pressure operational restriction, monitoring, record keeping, and reporting requirements specified below (see Sections A.II, A.III, and A.IV below) to ensure the ongoing integrity of the PTE.

2.e The permittee shall employ an incineration system to control the organic compound (OC) emissions from the permanent total enclosure. The incinerator system shall have an OC destruction efficiency of at least 90%, by weight.

2.f If the facility's emissions of hazardous air pollutants (HAPs) exceeds 5 tons per rolling, 12-month period for any individual HAP or 12.5 tons per rolling, 12-month period for the total, combined HAPs, this facility becomes a major source and must comply with the requirements of 40 CFR Part 63, Subpart JJ, within 365 days after the exceedance. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Ohio EPA Northeast District Office.

II. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.

2. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

3. This emissions unit shall be totally enclosed such that all the OC emissions are captured for venting to the thermal incinerator. Compliance with the following criteria, as specified by USEPA Method 204, shall be met by the permittee:

a. any natural draft opening (NDO) shall be at least four equivalent opening diameters from each OC emitting point unless otherwise specified by the Administrator;

b. the total area of all NDO's shall not exceed 5 percent of the surface area of the enclosure's four walls, floor and ceiling;

c. the average facial velocity (FV) of air through all the NDO's shall be at least 3,600 m/hr (200 fpm), as a 3 hour average;

d. the differential pressure between the inside and outside of the enclosure shall not be less than 0.007 inch of water, as a 3 hour average;

e. the direction of air flow through all NDO's shall be into the enclosure;

f. all access doors and windows whose areas are not included in section (b) and are not included in the calculations in section (c) shall be closed during routine operation of the process; and

g. all OC emissions from the coating line must be captured and contained for discharge to the thermal incinerator.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.

2. The permittee shall maintain and operate monitoring devices and a recorder which continuously and simultaneously measure and record the differential pressure between the inside and outside the permanent total enclosure. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

3. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the combustion temperature. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

4. The permittee shall collect and record the following information for each day for the control equipment:

a. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation;

b. all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance; and

c. all 3-hour blocks of time during which the average static pressure differential across the building enclosure was less than the 0.007 inch water, when the emissions unit was in operation.

5. The permittee shall collect and record the following information each day for emissions units K001, K004, K005, K007 and K009, combined:

a. the company identification for each coating and cleanup material employed;

b. the number of gallons of each coating and cleanup material employed;

c. the VOC content of each coating and cleanup material, in pounds per gallon; and

d. the total controlled VOC emissions rate for all coatings and cleanup materials, in pounds per day (i.e., calculated using the overall control efficiency from the most recent performance test that demonstrated that the emissions unit was in compliance).

Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

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

6. The permittee shall collect and record the following information each month for all emissions units at the facility:

a. the name and identification number of each coating, as applied;

b. the individual HAP * content for each HAP of each coating, in pounds of individual HAP per gallon of coating, as applied;

c. the total combined HAPs content of each coating, in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from b);

d. the number of gallons of each coating employed;

e. the name and identification of each cleanup material employed;

f. the individual HAP content for each HAP of each cleanup material, in pounds of individual HAP per gallon of cleanup material, as applied;

g. the total combined HAPs content of each cleanup material, in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from f);

h. the number of gallons of each cleanup material employed;

i. the total, controlled individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per month (for each HAP, the sum of b times d for each coating plus the sum of f times h for each cleanup material for the previous month, multipled by 1 minus the overall control efficiency from the most recent performance test that demonstrated that the emissions units were in compliance);

j. the total, controlled individual HAP emissions for each HAP from all coatings and cleanup materials employed, in tons per rolling, 12-month period (for each HAP, the sum of i. for the previous 12 months);

k. the total, controlled combined HAPs emissions from all coatings and cleanup materials employed, in tons per month (the sum of c times d for each coating plus the sum of g times h for each cleanup material for the previous month, multiplied by 1 minus the overall control efficiency from the most recent performance test that demonstrated that the emissions units were in compliance); and

l. the total, controlled combined combined HAPs emissions from all coatings and cleanup materials employed, in tons per rolling, 12-month period (the sum of k. for the previous 12-month period).

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA Northeast District Office contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

IV. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify any daily record showing that the emissions of VOC from emissions units K001, K004, K005, K007 and K009, combined, exceeded the daily emission limit specified above.

3. The permittee shall submit quarterly deviation (excursion) reports which identify any record showing that the pressure drop across the building enclosure was less than 0.007 inch of water, as a 3-hour average, when the emissions unit was in operation.

IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emissions test that demonstrated the emissions unit was in compliance.

5. The permittee shall submit quarterly summary reports which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.

6. The permittee shall submit quarterly deviation (excursion) reports in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.

7. The permittee shall submit annual reports which specify the following information for the previous calendar year:

a. the total, controlled VOC emissions from emissions units K001, K004, K005, K007 and K009, combined;

b. the total, controlled emissions of each individual HAP from emissions units K001, K004, K005, K007 and K009, combined; and

c. the total, controlled emissions of total combined HAPs from emissions units K001, K004, K005, K007 and K009, combined.

These reports shall be submitted by January 31 of each year.

8. The permittee shall notify this office within 30 days of the first monthly record that shows the facility emitted more than 5 tons of a single HAP per rolling, 12 month period or more than 12.5 tons of combined HAPs per rolling, 12-month period.

V. Testing Requirements

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

1.a Emissions Limitation:
1008 pounds per day of VOC emissions from emissions units K001, K004, K005, K007 and K009, combined.

Applicable Compliance Method:
Compliance shall be based upon the record keeping specified in Section A.III.5.d.

1.b Emissions Limitation:
153.3 tons per year of VOC emissions from emissions units K001, K004, K005, K007 and K009, combined.

Applicable Compliance Method:
Compliance shall be based on Section A.III.5 and shall be the sum of the 365 daily emission rates for the calendar year.

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

V. Testing Requirements (continued)

3. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing of the control device shall be conducted 2.5 years after the issuance of the final operating permit. The building enclosure shall be tested to verify permanent total enclosure within six months after the issuance of the final permit.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds and the ninety (90) percent destruction efficiency requirement for the thermal incinerator.

c. The following test method(s) shall be employed to demonstrate compliance with the destruction efficiency requirement for the thermal incinerator: Method 25 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA. The test method and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) The control efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases."

e. The test shall be conducted while all the emissions units are operating at or near their maximum capacities, unless otherwise specified or approved by the appropriate Ohio EPA, Northeast District Office.

f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA, Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northeast District Office's refusal to accept the results of the emission test(s).

g. Personnel from the Ohio EPA, Northeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northeast District Office.

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
K009 - test booth consisting of two coating booths and a flash-off oven all controlled by the building enclosure and thermal oxidizer, for the application of toners, stains, sealers and topcoats to wood		

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit, K009, was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

1.a Pollutant: Acetone

TLV (mg/m3): 1780

Maximum Hourly Emission Rate (lbs/hr): 7.51

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 52.4

MAGLC (ug/m3): 4238

1.b Pollutant: Ethyl benzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 1.86

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 12.9

MAGLC (ug/m3): 1033

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

1.c Pollutant: Isobutyl acetate

TLV (mg/m3): 713

Maximum Hourly Emission Rate (lbs/hr): 6.00

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 41.9

MAGLC (ug/m3): 1698

1.d Pollutant: Isopropyl acetate

TLV (mg/m3): 1040

Maximum Hourly Emission Rate (lbs/hr): 5.10

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 35.6

MAGLC (ug/m3): 2476

1.e Pollutant: Isopropyl alcohol

TLV (mg/m3): 983

Maximum Hourly Emission Rate (lbs/hr): 2.13

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 14.9

MAGLC (ug/m3): 2340

1.f Pollutant: Metyl n-amyl ketone

TLV (mg/m3): 233

Maximum Hourly Emission Rate (lbs/hr): 3.67

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 25.6

MAGLC (ug/m3): 555

1.g Pollutant: Methyl propyl ketone

TLV (mg/m3): 705

Maximum Hourly Emission Rate (lbs/hr): 1.92

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 13.4

MAGLC (ug/m3): 1679

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

1.h Pollutant: Stoddard solvent

TLV (mg/m3): 525

Maximum Hourly Emission Rate (lbs/hr):7.25

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 50.6

MAGLC (ug/m3): 1250

1.i Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 1.14

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 7.94

MAGLC (ug/m3): 448

1.j Pollutant: 1,2,4-Trimethyl benzene

TLV (mg/m3): 123

Maximum Hourly Emission Rate (lbs/hr): 3.83

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 26.8

MAGLC (ug/m3): 293

1.k Pollutant: Xylene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 8.17

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 57.0

MAGLC (ug/m3): 1033

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

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

3. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Machining Wood Parts For Cabinet Production (P001)

Activity Description: Particleboard, Fiber Board and Solid Wood pieces will be machined to make components for the assembly of cabinets.

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
Wood cabinet manufacturing operation controlled by dust collection systems "A" and "B". Each dust collection system consists of a large diameter cyclone, a baghouse, and a woodwaste storage bin vented to the baghouse. The dust collection systems normally vent into the building.	OAC rule 3745-31-05(A)(3) PTI 02-5706	See A.I.2.a, A.I.2.b and A.I.2.c below.
	OAC rule 3745-17-07(B)	Exempt due to location in a non-Appendix A area.
	OAC rule 3745-17-08(B)	Exempt due to location in a non-Appendix A area.
	OAC rule 3745-17-11	The requirements of this rule are less stringent than the emissions limit established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	The requirements of this rule are less stringent than the emissions limit established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

2.a The dust collection systems combined shall not emit more than 6.4 pounds per hour of particulate emissions.

2.b Visible emissions shall not exceed 10% opacity from any building opening when the dust collection system is vented inside.

2.c Visible emissions shall not exceed 10% opacity from the stack when the dust collection system is vented outside.

II. Operational Restrictions

1. The pressue drop across each baghouse shall be maintained within the manufacturer's recommended range of 0.3 to 4.0 inches of water while the emissions unit is in operation.

II. Operational Restrictions (continued)

2. The waste wood storage container vent shall be controlled by the baghouse at all times the woodworking shop is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across each baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each baghouse on a daily basis.

2. The permittee shall maintain daily records that document all time periods when the waste wood storage bin vents were not contolled by the baghouse while the woodworking shop was in operation.

3. The permittee shall perform weekly checks for any visible particulate emissions from the exhaust of each baghouse. The presence or absence of any visible emissions from the exhaust of each baghouse shall be noted in an operations log. If any visible emissions are observed, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

NOTE: The exhaust from each baghouse for this emissions unit is currently vented back into the building. This is the normal operating mode for this emissions unit. The exhaust from each baghouse is also capable of venting directly to the atmosphere through a stack.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across each baghouse did not comply with the allowable range specified above.

2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the wood waste storage bin vent was not controlled by the baghouse while the woodworking shop was in operation.

3. All deviation (excursion) reports shall be submitted in accordance with Section A.1.c of the General Terms and Condition of this permit.

4. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the baghouses serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

1.a Emission Limitation:
6.4 pounds per hour of particulate emissions.

Applicable Compliance Methods:
If required, compliance shall be determined by stack testing according to OAC rule 3745-17-03(B)(10), (Method 5, 40 CFR 60, Appendix A).

1.b Emissions Limitation:
Visible emissions shall not exceed 10% opacity from the stack when the baghouse is vented outside.

Applicable Compliance Methods:
Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(3) (Method 9, 40 CFR 60, Appendix A).

V. Testing Requirements (continued)

1.c Emissions Limitation:
Visible emissions shall not exceed 10% opacity from any building opening when the baghouse is vented inside.

Applicable Compliance Methods:
Compliance shall be determined in accordance with OAC rule 3745-17-03(B)(3) (Method 9, 40 CFR 60, Appendix A).

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: Machining Wood Parts For Cabinet Production (P002)

Activity Description: Particleboard, Fiber Board and Solid Wood pieces will be machined to make components for the assembly of cabinets.

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
Wood cabinet manufacturing operation controlled by dust collection sytem "C", consisting of a large diameter cyclone, a baghouse rated at 75,000 acfm and a wood storage bin vented to the baghouse. The dust collection system normally vents into the building.	OAC rule 3745-31-05(A)(3) PTI 02-11260 as modified on 2/18/98	See A.I.2.a and A.I.2.b below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(B)	Exempt due to location in a non-Appendix A area.
	OAC rule 3745-17-08(B)	Exempt due to location in a non-Appendix A area.
	OAC rule 3745-17-11	The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	See A.I.2.c below.

2. Additional Terms and Conditions

2.a Particulate emissions shall not exceed 4.0 lbs/hr.

2.b Visible emissions shall not exceed 20% opacity as a six-minute average from any building opening when the dust collection system is vented inside the building.

2.c Visible emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule, from the stack when the dust collection system is vented outside the building.

II. Operational Restrictions

1. The pressue drop across the baghouse shall be maintained within the manufacturer's recommended range of 0.3 to 5 inches of water while the emissions unit is in operation.

2. The waste wood storage container vent shall be controlled by the baghouse at all times the woodworking shop is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

2. The permittee shall maintain daily records that document all time periods when the waste wood storage bin vent was not contolled by the baghouse while the woodworking shop was in operation.

3. The permittee shall perform weekly checks for any visible particulate emissions from the exhaust of the baghouse. The presence or absence of any visible emissions from the exhaust of the baghouse shall be noted in an operations log. If any visible emissions are observed, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.

NOTE: The exhaust from the baghouse for this emissions unit is currently vented back into the building. This is the normal operating mode for this emissions unit. The exhaust from the baghouse is also capable of venting directly to the atmosphere through a stack.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable rate specified above.

2. The permittee shall submit deviation (excursion) reports that identify all periods of time during which the wood waste storage bin vent was not controlled by the baghouse while the woodworking shop was in operation.

3. All deviation (excursion) reports shall be submitted in accordance with Section A.1.c of the General Terms and Condition of this permit.

4. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

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

1.a Emission Limitation:
4.0 pounds per hour of particulate emissions

Applicable Compliance Methods:
If required, compliance shall be determined according to OAC rule 3745-17-03(B)(10) (Method 5, 40 CFR 60, Appendix A).

1.b Emissions Limitation:
Visible emissions shall not exceed 20% opacity as a six-minute average from any building opening when the baghouse is vented inside the building.

Applicable Compliance Methods:
Compliance shall be determined according to OAC rule 3745-17-03(B) (Method 9, 40 CFR 60, Appendix A).

1.c Emissions Limitation:
Visible emissions shall not exceed 20% opacity as a six-minute average from the stack when the baghouse is vented outside the building.

Applicable Compliance Methods:
Compliance shall be determined according to OAC rule 3745-17-03(B) (Method 9, 40 CFR 60, Appendix A).

VI. Miscellaneous Requirements

1. In order to meet the National Ambient Air Quality Standards and Ohio EPA's policy that no new source may consume more than one-half of the available PSD increment, the permittee shall exhaust the air contaminant emissions from this emissions unit through a stack that is at least 10 feet higher than the highest point in the adjoining building's roofline or 45 feet above said building's grade level.

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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