



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

5/20/2013

Christopher Wittrock
Wittrock Woodworking & Mfg.
4201 MALSARY RD
BLUE ASH, OH 45242

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1431054014
Permit Number: P0114232
Permit Type: Renewal
County: Hamilton

Certified Mail

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

Dear Permit Holder:

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

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: SWOAQA



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Wittrock Woodworking & Mfg.**

Facility ID:	1431054014
Permit Number:	P0114232
Permit Type:	Renewal
Issued:	5/20/2013
Effective:	5/20/2013
Expiration:	5/20/2018



Division of Air Pollution Control
Permit-to-Install and Operate
for
Wittrock Woodworking & Mfg.

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Final Permit-to-Install and Operate
Wittrock Woodworking & Mfg.
Permit Number: P0114232
Facility ID: 1431054014
Effective Date: 5/20/2013

Authorization

Facility ID: 1431054014
Application Number(s): A0046755
Permit Number: P0114232
Permit Description: Renewal PTIO for sawdust unloading, woodworking operations and seven wood coating paint spray booths.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 5/20/2013
Effective Date: 5/20/2013
Expiration Date: 5/20/2018
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Wittrock Woodworking & Mfg.
4201 Malsbary Rd
Blue Ash, OH 45242

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

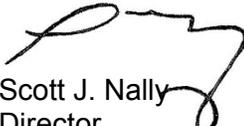
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0114232
 Permit Description: Renewal PTIO for sawdust unloading, woodworking operations and seven wood coating paint spray booths.

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

Emissions Unit ID: F001
 Company Equipment ID: Sawdust Unloading
 Superseded Permit Number: P0097988
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P901
 Company Equipment ID: Woodworking Operation
 Superseded Permit Number: P0097988
 General Permit Category and Type: Not Applicable

Group Name: Paint Booths

Emissions Unit ID:	R001
Company Equipment ID:	Wood coating line #1
Superseded Permit Number:	P0097988
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R002
Company Equipment ID:	Wood coating line #2
Superseded Permit Number:	P0097988
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R003
Company Equipment ID:	Wood coating line #3
Superseded Permit Number:	P0097988
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R004
Company Equipment ID:	Wood coating line #4
Superseded Permit Number:	P0097988
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R005
Company Equipment ID:	Wood coating line #5
Superseded Permit Number:	P0097988
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R006
Company Equipment ID:	Wood coating line #6
Superseded Permit Number:	P0097988
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R008
Company Equipment ID:	Wood coating line #8
Superseded Permit Number:	P0097988
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
Wittrock Woodworking & Mfg.
Permit Number: P0114232
Facility ID: 1431054014
Effective Date: 5/20/2013

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Southwest Ohio Air Quality Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
Wittrock Woodworking & Mfg.
Permit Number: P0114232
Facility ID: 1431054014
Effective Date: 5/20/2013

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) 2., 3., 4. and 5.
2. The actual emissions of hazardous air pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units R001, R002, R003, R004, R005, R006 and R008, including any de minimis emissions units as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit shall not exceed 9.9 TPY for any single HAP, as a rolling, 12-month summation, and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
3. The permittee shall collect and record the following information each month for the emissions units identified in 2:
 - a) The name and identification number of each HAP containing material employed;
 - b) The individual Hazardous Air Pollutant (HAP)* content for each HAP of each HAP containing material, in pounds of individual HAP per gallon of HAP containing material, as applied;
 - c) The total combined HAP content of each HAP containing material in pounds of combined HAPs per gallon of HAP containing material, as applied;
 - d) The number of gallons of each HAP containing material employed;
 - e) The name and identification of each HAP containing cleanup material employed;
 - f) The individual HAP content for each HAP of each HAP containing cleanup material, in pounds of individual HAP per gallon of HAP containing cleanup material, as applied;
 - g) The total combined HAP content of each HAP containing cleanup material, in pounds of combined HAPs per gallon of HAP containing cleanup material, as applied;
 - h) The number of gallons of each HAP containing cleanup material employed [the total number of gallons of each HAP containing cleanup material employed less the number of gallons of each HAP containing cleanup material collected for reuse and disposal];
 - i) The total individual HAP emissions for each HAP from all HAP containing material and HAP containing cleanup materials employed, in pounds or tons per month;



- j) The total combined HAP emissions from all HAP containing materials and HAP containing cleanup materials employed, in pounds or tons per month;
- k) The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.; and
- l) The updated rolling, 12-month summation of the combined HAP emissions ***, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southwest Ohio Air Quality Agency. This information does not have to be kept on an individual emissions unit basis.

4. The permittee shall submit quarterly deviation (excursion) reports that identify:
- a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - (1) All exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the HAP containing materials employed; and
 - (2) All exceedances of the rolling, 12-month total combined HAP emission limitation for all the HAP containing materials employed
 - b) the probable cause of each deviation (excursion);
 - c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d) the magnitude and duration of each deviation (excursion).

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

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

Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.



Final Permit-to-Install and Operate

Wittrock Woodworking & Mfg.

Permit Number: P0114232

Facility ID: 1431054014

Effective Date: 5/20/2013

5. Compliance with the HAP's emission limitations in B.2. shall be demonstrated by the record keeping in B.3.



Final Permit-to-Install and Operate
Wittrock Woodworking & Mfg.
Permit Number: P0114232
Facility ID: 1431054014
Effective Date: 5/20/2013

C. Emissions Unit Terms and Conditions



1. F001, Sawdust Unloading

Operations, Property and/or Equipment Description:

Sawdust unloading

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 24.0 pounds per week (lbs/wk) and 0.6 ton per year (TPY). Particulate matter 10 microns and less in diameter (PM10) emissions shall not exceed 7.68 lbs/wk and 0.19 TPY. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B). See c)(1).
b.	OAC rule 3745-17-07(B)	Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
c.	OAC rule 3745-17-08(B)	See b)(2)a.



- (2) Additional Terms and Conditions
 - a. The drop height of the telescopic tube shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust from emissions unit F001 during sawdust unloading.
 - b. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by limiting the amount of sawdust unloaded on an annual basis and requiring the drop height of the telescopic tube to be minimized during sawdust unloading.
- c) Operational Restrictions
 - (1) The maximum amount of sawdust unloaded shall not exceed 4000 cubic yards per year.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain monthly records of the amount of sawdust unloaded.
- e) Reporting Requirements
 - (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
 - (2) The permittee shall submit annual reports which specify the total particulate matter emissions from emissions unit F001 for the previous calendar year. Emissions shall be calculated as follows:

(tons of sawdust collected the previous year X (1-.85)* X 2 pounds of PE/ ton of fugitive sawdust) divided by 2000 = TPY PE

The following assumptions should be employed:

There is an 85% control efficiency employed for use of partial enclosure.

1 cubic yard of sawdust weighs 300 pounds.

These reports shall be submitted by January 31 of each year.
- f) Testing Requirements
 - (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Particulate emissions (PE) shall not exceed 24.0 pounds per week (lbs/wk) and 0.6 ton per year (TPY).



Applicable Compliance Method:

If testing is required to determine compliance with the allowable PE/PM10 emission limitations, then testing shall be conducted using the following methods:

For PE: Method 5 of 40 CFR Part 60, Appendix A shall be used.

For PM10 : Method 201 of 40 CFR Part 51, Appendix M shall be used.

b. Emission Limitation:

Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

(2) Operational Restriction:

The maximum amount of sawdust unloaded shall not exceed 4000 cubic yards per year.

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements in d)(1).

g) Miscellaneous Requirements

(1) None.



2. P901, Woodworking Operation

Operations, Property and/or Equipment Description:

Woodworking operation with baghouse

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 10.87 pounds per hour (lbs/hr) and 21.79 tons per year (TPY). Particulate matter 10 microns and less in diameter (PM10) emissions shall not exceed 3.48lbs/hr and 6.97 TPY. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), 3745-17-07(B) and OAC rule 3745-17-08(B). See c)(1) and c)(2).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-17-07(B)	Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.
d.	OAC rule 3745-17-08(B)	Fugitive particulate emissions shall not exceed 0.03 grains per dry standard cubic foot. See c)(2).
e.	OAC rule 3745-17-11	The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a baghouse, visible emissions limitations and sawdust throughput limitations.

c) Operational Restrictions

(1) The maximum amount of sawdust collected shall not exceed 4000 cubic yards per year.

(2) The permittee shall employ partial enclosure to minimize fugitive particulate emissions.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the amount of sawdust collected.

(2) The acceptable range for the pressure drop across the baghouse shall be based upon the manufacturer's specifications, until such time as any required performance testing is conducted and an alternative pressure drop range and/or limit is established.

(3) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the



cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit.



The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

- (3) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

- (4) The permittee shall submit annual reports which specify the total particulate matter emissions from emissions unit P901 for the previous calendar year. Emissions shall be calculated as follows:

[(amount of sawdust collected, in cubic yards the previous year x 7.88lbs of fugitive PE/cubic yard of sawdust collected) + (amount of sawdust collected, in cubic yards the previous year x 2.99 pounds of stack PE/cubic yard of sawdust collected)] x ton/2000 lbs.

PM10 emissions are assumed to be 32% of PE

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

f) **Testing Requirements**

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

Particulate emissions (PE) shall not exceed 10.87 pounds per hour (lbs/hr) and 21.79 tons per year (TPY).



Applicable Compliance Method:

hourly PE emissions and annual PE emissions shall be calculated using the following equations:

$$\text{lbs/hr PE} = [(A) \times (B) \times (C)] + [(A) \times (D) \times (E)]$$

$$\text{TPY PE} = [(F) \times (B) \times (C) \times 1 \text{ ton}/2000 \text{ lbs}] + [(F) \times (D) \times (E) \times 1 \text{ ton}/2000 \text{ lbs}]$$

Where,

A = maximum hourly amount of sawdust produced, pounds = 315 pounds

B = emission factor of 0.95 pounds sawdust captured per pound sawdust produced

C = baghouse control efficiency of 99%, expressed as a decimal (0.01)

D = emission factor of 0.05 pound fugitive sawdust per pound of sawdust produced

E = partial enclosure control efficiency of 50%, expressed as a decimal (0.50)

F = maximum annual amount of sawdust produced, pounds (1,263,300)

b. Emission Limitations:

Particulate matter 10 microns and less in diameter (PM10) emissions shall not exceed 3.48lbs/hr and 6.97 TPY

Applicable Compliance Method:

hourly PM10 emissions and annual PM10 emissions shall be calculated using the following equations:

$$\text{lbs/hr PM10} = (A) \times (B)$$

$$\text{TPY PM10} = (C) \times (B)$$

Where,

A = lbs/hr PE, as calculated in f)(1)a., above

B = PM10 emission factor of 32%, expressed as a decimal (0.32)

C = TPY PM10, as calculated in f)(1)a., above

c. Emission Limitation:

Visible emissions of fugitive dust shall not exceed twenty percent opacity as a three-minute average.



Applicable Compliance Method:

Compliance with the limitation for visible emissions of fugitive dust shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

d. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

(2) Operational Restriction:

The maximum amount of sawdust unloaded shall not exceed 4000 cubic yards per year.

Applicable Compliance Method:

Compliance shall be determined by the recordkeeping requirements in d)(1).

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group - Paint Booths: R001, R002, R003, R004, R005, R006, R008

EU ID	Operations, Property and/or Equipment Description
R001	Wood Coating Line with Associated Cleaning, Washoff, and Gluing Processes
R002	Wood Coating Line with Associated Cleaning, Washoff, and Gluing Processes
R003	Wood Coating Line with Associated Cleaning, Washoff, and Gluing Processes
R004	Wood Coating Line with Associated Cleaning, Washoff, and Gluing Processes
R005	Wood Coating Line with Associated Cleaning, Washoff, and Gluing Processes
R006	Wood Coating Line with Associated Cleaning, Washoff, and Gluing Processes
R008	Wood Coating Line with Associated Cleaning, Washoff, and Gluing Processes

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

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

a. d)(3).

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

a. b)(1)b., b)(2)a., b)(2)b., c)(1), d)(2), e)(2), e)(4) and f)(1)b.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Emissions of Volatile Organic Compounds (VOC) shall not exceed 40 pounds per day (lbs/day) and 3.5 tons per year (TPY) for each emissions unit R001 through R006 and R008. The requirements of this rule also include compliance with the requirements of OAC rule OAC rule 3745-31-05(D). See b)(2)b.
b.	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 24.9 TPY from emissions units R001, R002,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Synthetic minor to avoid Title V permitting, 40 CFR Part 63 Subpart JJ and OAC rule 3745-21-15.	R003, R004, R005, R006 and R008 combined, based on a rolling 12-month summation. See section B.2. and b)(2)a.

(2) Additional Terms and Conditions

- a. The total allowable volatile organic compound (VOC) emissions from all the woodfinishing processes and associated cleaning, washoff and gluing processes located at this facility shall not exceed 24.9 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.
- b. The VOC content of all coating and cleanup materials employed in emissions unit R001 shall not exceed 7.0 pounds of VOC per gallon.

c) Operational Restrictions

- (1) The maximum annual coating and cleanup material usage for emissions units R001, R002, R003, R004, R005, R006 and R008 shall not exceed 1000 gallons for each emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day for emissions units R001, R002, R003, R004, R005, R006 and R008:
 - 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 volatile organic compound content of each coating and cleanup material, in pounds per gallon; and
 - d. the total volatile organic compound emission rate for all coatings and cleanup materials, in pounds per day.

These daily records shall be summed annually to demonstrate compliance with the annual emission limitation.



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

- (2) The permittee shall collect and record the following information each month for emissions units R001, R002, R003, R004, R005, R006 and R008, combined:
- a. the name and identification number of each coating, cleaning, washoff and gluing material employed. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means;
 - b. the volume, in gallons, of each coating, cleaning, washoff and gluing material employed;
 - c. the VOC content of each coating, cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied;
 - d. the amount of VOC emitted for all coating, cleaning, washoff and gluing materials employed, in pounds per month (b x c);
 - e. the rolling, 12-month* usage for coating, cleaning, washoff and gluing materials, in gallons; and
 - f. the rolling, 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place).

*A rolling, 12-month period includes the previous set of 12 calendar months.

- g. Monthly records shall be completed within 15 days following the end of each calendar month and shall include the updated rolling, 12-month VOC emission rate.

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

- (3) The permit to install and operate for each emissions unit (R001-R006 and R008) was evaluated based on the actual materials and the design parameters of each emissions unit's exhaust system, as specified by the permittee in the permit to install and operate application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use



of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: isobutanol
TLV (ug/m3): 152,000
Maximum Hourly Emission Rate (lbs/hr): 1.42
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 163
MAGLC (ug/m3): 3619

Pollutant: toluene
TLV (ug/m3): 188,000
Maximum Hourly Emission Rate (lbs/hr): 3.03
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 347
MAGLC (ug/m3): 4476

The above described evaluation determined that the maximum ground level concentrations for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. 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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- 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.).

The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.



e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. HAPs emissions limitation outlined in Section B.
 - ii. VOC emissions limitation outlined in b)(2)a.
 - iii. VOC content limitation in b)(2)b.
 - iv. Material usage limitation in c)(1).
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

- (4) If the facility (R001, R002, R003, R004, R005, R006 and R008) has a rolling, 12 month record that exceeds 24.9 tons of VOC from combined operations associated with the



manufacture of wood furniture, or wood furniture components, the permittee shall submit the following:

- a. within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Southwest Ohio Air Quality Agency that the VOC emission limit was exceeded;
- b. within three months after the end of that rolling, 12-month period in which the exceedance occurred, a compliance plan to the Southwest Ohio Air Quality Agency to comply with the presumptive RACT standards specified within USEPA document EPA-453/R-96-007 "Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations" (April 1996). Any divergence from the presumptive RACT standards and the model rule provided within that document shall be described at the time of the submittal of the 3-month compliance plan. Compliance with the presumptive RACT standards is to be achieved within 12 months after the rolling, 12-month period exceedance, unless otherwise requested by the permittee and approved by USEPA as a revision to Ohio's state implementation plan for ozone; and
- c. exceeding the 24.9 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 24.9 TPY limit is exceeded , regardless of whether a compliance plan is submitted.

f) Testing Requirements

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

a. Emission Limitation:

Emissions of Volatile Organic Compounds (VOC) shall not exceed 40 pounds per day (lbs/day) and 3.5 tons per year (TPY).

Applicable Compliance Method:

Compliance shall be determined by the required recordkeeping required in d)(1).

b. Emission Limitation:

The total allowable volatile organic compound (VOC) emissions from all the woodfinishing processes and associated cleaning, washoff and gluing processes located at this facility shall not exceed 24.9 TPY based on a rolling, 12-month summation.

Applicable Compliance Method:



Compliance shall be determined by the required recordkeeping required in d)(2).

c. Emission Limitation:

The VOC content of all coating and cleanup materials employed in emissions unit R001 shall not exceed 7.0 pounds of VOC per gallon.

Applicable Compliance Method:

Compliance shall be determined by the required recordkeeping required in d)(1).

OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning, washoff and gluing materials employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, cleaning, washoff or gluing material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for the coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(2) Operational Restriction:

The maximum annual coating and cleanup material usage for emissions unit R001 shall not exceed 1000 gallons.

Applicable Compliance Method:

Compliance shall be determined by the required recordkeeping required in d)(1).

g) Miscellaneous Requirements

(1) None.