



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

7/16/2013

Willis Mast
Kohler Woodcraft
7284 S. Kohler Road
Apple creek, OH 44606

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0285000460
Permit Number: P0114754
Permit Type: Renewal
County: Wayne

Certified Mail

| | |
|----|------------------------------------|
| No | TOXIC REVIEW |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| No | CEMS |
| No | MACT/GACT |
| No | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MODELING SUBMITTED |
| No | SYNTHETIC MINOR TO AVOID TITLE V |
| No | 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 Ohio EPA DAPC, Northeast District Office at (330)425-9171 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: Ohio EPA-NEDO



FINAL

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

| | |
|----------------|------------|
| Facility ID: | 0285000460 |
| Permit Number: | P0114754 |
| Permit Type: | Renewal |
| Issued: | 7/16/2013 |
| Effective: | 7/16/2013 |
| Expiration: | 11/14/2018 |



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

for
Kohler Woodcraft

Table of Contents

| | |
|---|----|
| Authorization | 1 |
| A. Standard Terms and Conditions | 3 |
| 1. What does this permit-to-install and operate ("PTIO") allow me to do?..... | 4 |
| 2. Who is responsible for complying with this permit? | 4 |
| 3. What records must I keep under this permit? | 4 |
| 4. What are my permit fees and when do I pay them?..... | 4 |
| 5. When does my PTIO expire, and when do I need to submit my renewal application? | 4 |
| 6. What happens to this permit if my project is delayed or I do not install or modify my source? | 5 |
| 7. What reports must I submit under this permit? | 5 |
| 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? | 5 |
| 9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ... | 5 |
| 10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? | 6 |
| 11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? | 6 |
| 12. What happens if one or more emissions units operated under this permit is/are shut down permanently? | 6 |
| 13. Can I transfer this permit to a new owner or operator?..... | 7 |
| 14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? | 7 |
| 15. What happens if a portion of this permit is determined to be invalid? | 7 |
| B. Facility-Wide Terms and Conditions..... | 8 |
| C. Emissions Unit Terms and Conditions | 10 |
| 1. P001, Wood working operations | 11 |
| 2. R001, Coating Booth #1 | 16 |



Final Permit-to-Install and Operate
Kohler Woodcraft
Permit Number: P0114754
Facility ID: 0285000460
Effective Date: 7/16/2013

Authorization

Facility ID: 0285000460
Application Number(s): A0047901
Permit Number: P0114754
Permit Description: Renewal PTIO for emissions units P001 (woodworking operations) and R001 (wood coating operation).
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 7/16/2013
Effective Date: 7/16/2013
Expiration Date: 11/14/2018
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Kohler Woodcraft
7284 S Kohler Rd
Apple Creek, OH 44606

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:

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

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

A handwritten signature in black ink, appearing to read "Scott J. Nally".

Scott J. Nally
Director



Final Permit-to-Install and Operate
Kohler Woodcraft
Permit Number: P0114754
Facility ID: 0285000460
Effective Date: 7/16/2013

Authorization (continued)

Permit Number: P0114754
Permit Description: Renewal PTIO for emissions units P001 (woodworking operations) and R001 (wood coating operation).

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

| | |
|-----------------------------------|-------------------------|
| Emissions Unit ID: | P001 |
| Company Equipment ID: | Wood working operations |
| Superseded Permit Number: | 02-22663 |
| General Permit Category and Type: | Not Applicable |
| Emissions Unit ID: | R001 |
| Company Equipment ID: | Coating Booth #1 |
| Superseded Permit Number: | 02-22663 |
| General Permit Category and Type: | Not Applicable |



Final Permit-to-Install and Operate
Kohler Woodcraft
Permit Number: P0114754
Facility ID: 0285000460
Effective Date: 7/16/2013

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 Ohio EPA DAPC, Northeast District Office 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
Kohler Woodcraft
Permit Number: P0114754
Facility ID: 0285000460
Effective Date: 7/16/2013

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Kohler Woodcraft

Permit Number: P0114754

Facility ID: 0285000460

Effective Date: 7/16/2013

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) None.



Final Permit-to-Install and Operate
Kohler Woodcraft
Permit Number: P0114754
Facility ID: 0285000460
Effective Date: 7/16/2013

C. Emissions Unit Terms and Conditions



1. P001, Wood working operations

Operations, Property and/or Equipment Description:

Woodworking shop consisting of saws, planers, sanders, routers, shapers all controlled by a cyclone

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) | <p>Particulate emissions (PE) shall not exceed 3.57 pounds/hour and 15.64 ton/year.</p> <p>The cyclone serving the emissions unit shall achieve an outlet emission rate of not greater than 0.0551 grain of particulate emissions per dry standard cubic foot of exhaust gases</p> <p>Visible particulate emissions from the cyclone exhaust shall not exceed 5% opacity, as a 6-minute average, except as provided by the rule.</p> <p>Fugitive particulate emissions during load-out shall not exceed 20% opacity, as a 3-minute average, except as provided</p> |



| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|--|
| | | by the rule. |
| b. | OAC rule 3745-17-07(A) | The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). |
| c. | OAC rule 3745-17-07(B) | See b)(2)a. |
| d. | OAC rule 3745-17-08(B) | See b)(2)b. |
| e. | OAC rule 3745-17-11 | The emission limitation specified 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. This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).
- b. This emissions unit is not located within an area identified in "Appendix A" of OAC rule 3745-17-08 (Holmes County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- c. The emissions from this emissions unit shall be vented to the cyclone at all times the emissions unit is in operation.

c) Operational Restrictions

- (1) The cyclone dust collector shall be operated in such a manner as to provide sufficient volumetric flow rate to eliminate visible particulate emissions at the point(s) of capture to the extent possible using all good engineering practices.
- (2) During any unloading of sawdust into the container, every attempt shall be made to reduce or control fugitive dust emissions by minimizing drop height, utilizing high side boards, telescoping or fabric tubes to reduce drop height during the unloading process. The collection efficiency shall be considered adequate if there are no visible particulate emissions of fugitive dust from the fabric tube during wood waste storage load-out in excess of 20% opacity, as a 3-minute average.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall record in an operations log any time the telescoping fabric tube or other means to reduce drop height is not in use when sawdust load-out is in operation.
- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive particulate emissions from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an



operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
- (3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the cyclone serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.
- (4) The permittee shall inspect the cyclone monthly and record the following information:
- a. the date and time of the inspection;
 - b. any portion of the cleaning system, conveying system or hoppers that was not operating properly; and
 - c. any corrective action(s) taken.

e) Reporting Requirements

- (1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible fugitive 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.



- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the cyclone 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.
 - (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
 - (4) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:
 - a. 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 cyclone;
 - b. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., material loading and unloading, conveyors, etc.) serving this emissions unit;
 - c. all days during which any visible particulate emissions were observed from the stack serving this emission unit; and
 - d. any corrective actions taken to eliminate the visible emissions.
- 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:**

0.0551 grain per dry standard cubic foot of total exhaust gases and 3.57 pounds per hour of PE from the cyclone stack.

Applicable Compliance Method:

If required, compliance shall be demonstrated observations performed in accordance with 40 CFR Part 60, Appendix A, Method 5 and the methods and procedures specified in OAC rule 3745-17-03(B)(10).



b. Emission Limitation:

Particulate emissions (PE) shall not exceed 15.64 ton/year.

Applicable Compliance Method:

Compliance shall be demonstrated based on the following equation:

$$PE = (0.0551 \text{ gr/dscf})(7580 \text{ cfm})(60\text{min/hr})(8760\text{hr/yr})(1 \text{ lb}/7000 \text{ gr})(1 \text{ ton}/2000 \text{ lb})$$

Where;

0.0551 gr/dscf is the emission factor from AP-42, Table 10.4-2, and

7580 cfm is the flow rate of the cyclone

c. Emission Limitation:

Visible PE from the stack of the cyclone exhaust serving this emissions unit shall not exceed five percent (5%) opacity, as a 6-minute average.

Applicable Compliance Method:

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

d . Emission Limitation:

Fugitive particulate emissions during load-out shall not exceed 20% opacity, as a 3-minute average.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.



2. R001, Coating Booth #1

Operations, Property and/or Equipment Description:

Wood furniture coating operation consisting of dry overspray filters and one manual air spray gun. Parts are manually moved and air dried.

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) | The Volatile Organic Compound (VOC) emissions from all coatings employed shall not exceed 5.0 pound per hour. See b)(2)a and b((2)b. |
| b. | OAC rule 3745-17-11(C) | See c)(1). |

(2) Additional Terms and Conditions

a. The VOC content of each coating employed shall not exceed 6.0 pounds per gallon, as applied.

b. The VOC emissions from all coatings and cleanup materials employed shall not exceed 10.0 tons per year.



c) Operational Restrictions

- (1) The permittee shall install, operate, and maintain a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated



according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

- (6) The permittee shall collect and record the following information each day for the coating operations:
 - a. the name and identification number of each coating applied;
 - b. the VOC content (excluding water and exempt solvents) of each coating as applied, in pounds VOC per gallon of coating applied;
 - c. the number of gallons of each coating applied or cleanup material employed, minus the number of gallons of coating and/or cleanup material recovered for disposal;
 - d. the VOC emissions from each coating applied, for each coating, in pounds of VOC per coating;
 - e. the daily VOC emissions from all the coatings applied, in pounds of VOC per day;
 - f. the number of hours of operation; and
 - g. the hourly VOC emissions from all coatings applied.
- (7) The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the number of gallons of each cleanup material employed minus the number of gallons of cleanup material recovered for disposal;
 - b. the VOC content of each cleanup material employed, in pounds per gallon; and
 - c. the total VOC emissions from all cleanup materials employed, in pounds per month.
- (8) The permittee shall calculate and record the total annual VOC emissions from coatings and cleanup materials, i.e., the sum of the daily VOC emission rates from the coating materials for the calendar year, plus the sum of the monthly emissions from cleanup materials for the calendar year from this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA's Northeast District Office 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. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.



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:

VOC emissions from all coatings employed shall not exceed 5.0 pounds per hour.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(6)g.

b. Emission Limitation:

VOC emissions from all coatings and cleanup materials employed shall not exceed 10.0 ton per year.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(8), summation of monthly total VOC emissions.

c. Emission Limitation:

VOC content of each coating employed shall not exceed 6.0 pounds per gallon, as applied.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(6)b.

Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-15(l)(4), the permittee shall determine the composition of the coatings by using a certified product data sheet that provides data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.



g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials or use of new materials that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.