



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

12/03/98

CERTIFIED MAIL

02-38-00-0150

RE: Final Chapter 3745-35 Permit To Operate

Schrocks' Woodcrafts, Inc., Plant #2
Paul S. Schrock
3360 State Route 39
Millersburg, OH 44654-9267

Dear Paul S. Schrock:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the Northeast District Office at (330) 425-9171

Very truly yours,

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

cc: Northeast District Office
Jim Orlemann., DAPC Engineering
Becky Castle, DAPC PMU

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 12/03/98

Facility ID: 02-38-00-0150

Expiration Date: 12/03/03

FINAL ISSUE

This document constitutes issuance for:

Schrocks' Woodcrafts, Inc., Plant #2
4981 Township Road 401
Walnut Creek, OH 44654

of a permit to operate for:

R009 (Online Stain Booth)
Spray booth for application of stain (online) to wood cabinets.

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

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

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

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

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Northeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Donald R. Schegelski

Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Online Stain Spray Booth (R009)	OAC Rule 3745-31-05 (PTI No. 02-11354)	a. The total volatile organic compound (VOC) emissions from this emissions unit shall not exceed 120.0 pounds per day (lbs/day) and 18.0 tons per year (TPY). b. Emissions of xylene from this emissions unit shall not exceed 9.6 lbs/day and 1.44 TPY. c. Total emissions of Hazardous Air Pollutants (HAPs) from this emissions unit shall not exceed 11.2 lbs/day and 1.68 TPY. See A.2.a.
	OAC rule 3745-21-07	

2. Additional Terms and Conditions

- 2.a. No photochemically reactive materials (coatings and cleanup materials), as defined in OAC rule 3745-21-01, shall be utilized in the spray paint/stain booths (R004 – R009) at this facility.
- 2.b. Federally enforceable emission limitations for total volatile organic compounds (VOC) and total hazardous air pollutants (HAPs) from spray paint/stain booths R004 through R009, inclusive, at this facility shall be as follows:
- Total VOC emissions shall not exceed 664 lbs/day and 99.5 TPY;
 - Total xylene emissions shall not exceed 49.4 lbs/day and 7.4 TPY;
 - iii. Total toluene emissions shall not exceed 20.4 lbs/day and 3.1 TPY; and
 - iv. Total HAPs emissions shall not exceed 78.8 lbs/day and 11.8 TPY.

B. Operational Restrictions

1. No more than twenty (20) gallons of coatings shall be employed in this emissions unit during any single day of operations.

B. Operational Restrictions (continued)

2. During the first twelve (12) months of operation under this permit, each of the emissions units listed in this permit (R004 through R009) shall not exceed the number of days of operation (25 per month) or the number of gallons of coating usage (500 gallons per month based on 25 days per month times 20 gallons of coatings allowed per day) specified for each month in the following table. After the first 12 months of operation, the monthly days of operation and volume of coatings used per emissions unit (R004 through R009) shall not exceed 300 days or 6000 gallons, respectively, for any rolling 12-month period.

CALENDAR MONTH(S) (AFTER PERMIT ISSUANCE)	CUMULATIVE ALLOWABLE OPERATING DAYS	CUMULATIVE ALLOWABLE GALLONS of COATING
1	25	500
2	50	1000
3	75	1500
4	100	2000
5	125	2500
6	150	3000
7	175	3500
8	200	4000
9	225	4500
10	250	5000
11	275	5500
12	300	6000

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record, on a daily basis, the following information for this emissions unit:
- a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed and the total number of gallons of all coatings employed;
 - d. the VOC content of each coating and cleanup material employed, in pounds per gallon;
 - e. the content of each HAP (xylene, toluene, and any other HAP) in each coating and cleanup material employed, in pounds per gallon;
 - f. the VOC emission rate for each coating and cleanup material employed, in pounds per day;
 - g. the total VOC emission rate for all coatings and cleanup materials employed, in pounds per day;
 - h. the total individual emission rates of xylene, toluene, and any other HAP from all coatings and cleanup materials employed, in pounds per day; and
 - i. the total emission rate of all HAPs collectively from all coatings and cleanup materials employed, in pounds per day.
- [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, on a daily basis, the following information for emissions units R004 through R009, as a group:
- a. the total VOC emission rate from all coatings and cleanup materials employed, in pounds per day;
 - b. the total individual emission rates of xylene, toluene, and any other HAP from all coatings and cleanup materials employed, in pounds per day; and
 - c. the total emission rate of all HAPs collectively from all coatings and cleanup materials employed, in pounds per day.

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

3. The permittee shall collect and record, on a monthly basis, the following information for each of emissions units R004 through R009:
 - a. the total number of days of operation;
 - b. the total number of gallons of coatings employed;
 - c. the cumulative totals of both the monthly hours of operation and the total number of gallons of coatings employed during the first twelve (12) months of operation under this permit; and
 - d. after the first year of operation under this permit, the rolling 12-month summations of both the total monthly hours of operation and the total monthly gallons of coatings employed.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the VOC emissions from the coatings and cleanup materials exceeded the allowable VOC emission rate for this emissions unit and/or for emissions units R004 through R009 combined, and the actual VOC emissions rate(s) for each such day.
 - b. An identification of each day during which the emission rate of xylene and/or toluene exceeded the specific allowable daily emission rates for this emissions unit and/or for emissions units R004 through R009 combined, and the actual emission rate(s) for each such day.
 - c. An identification of each day during which the total emission rate for all HAPs exceeded the allowable daily total HAP emission rate for this emissions unit and/or for emissions units R004 through R009 combined, and the actual daily emission rate(s) for each such day.
 - d. An identification of each day during which this emissions unit employed more than 20 gallons of coatings, and the actual gallons of coatings employed.
 - e. During the first 12 months of operation under this permit, an identification of each month during which the cumulative total days of operation and/or gallons of coatings employed by this emissions unit exceeded the allowable limitations of this permit, and the actual monthly totals of the days of operation and/or the gallons of coatings employed during that month.
 - f. After the first 12 months of operation under this permit, an identification of each month during which the rolling 12-month summations for the total days of operation and/or the gallons of coatings employed in this emissions unit exceeded the allowable limitations of this permit, and the actual rolling 12-month summations of the total days of operation and/or the gallons of coatings employed during that month.
2. The permittee shall also submit annual reports which specify the total VOC, total xylene, and total HAPs emissions for this emissions unit and for emissions units R004 through R009 combined for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a. Emissions Limitations: Federally enforceable daily and annual VOC emissions shall not exceed 120.0 lbs/day and 18.0 TPY.

Applicable Compliance Method: Compliance with the daily and annual VOC emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the VOC emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 25 or 25a.

E. Testing Requirements (continued)

- 1.b.** Emissions Limitations: Federally enforceable daily and annual xylene emissions shall not exceed 9.6 lbs/day and 1.44 TPY.

Applicable Compliance Method: Compliance with the daily and annual xylene emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the xylene emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 18.

- 1.c.** Emissions Limitations: Federally enforceable daily and annual total HAPs emissions shall not exceed 11.2 lbs/day and 1.68 TPY.

Applicable Compliance Method: Compliance with the daily and annual total HAPs emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the total HAPs emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 18.

- 1.d** Emission limitations for R004 through R009 combined, as specified in Section A.2.b:

Applicable Compliance Method: Compliance shall be based upon the record keeping in Section C.

F. Miscellaneous Requirements

1. Operation of these emissions units shall not be allowed to create a public nuisance.

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 12/03/98

Facility ID: 02-38-00-0150

Expiration Date: 12/03/03

FINAL ISSUE

This document constitutes issuance for:

Schrocks' Woodcrafts, Inc., Plant #2
4981 Township Road 401
Walnut Creek, OH 44654

of a permit to operate for:

R008 (Online Sealer Booth)
Spray booth for application of wood sealer (online) to wood cabinets.

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

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

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

10. The permittee is also subject to the attached special terms and conditions

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

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

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Northeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Donald R. Schlegel

Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
On Line Sealer Spray Booth (R008)	OAC rule 3745-31-05 (PTI No. 02-11354)	a. The total volatile organic compound (VOC) emissions from this emissions unit shall not exceed 115.2 pounds per day (lbs/day) and 17.3 tons per year (TPY). b. Emissions of xylene from this emissions unit shall not exceed 7.4 lbs/day and 1.11 TPY. c. Emissions of toluene from this emissions unit shall not exceed 10.2 lbs/day and 1.53 TPY. d. Total emissions of Hazardous Air Pollutants (HAPs) from this emissions unit shall not exceed 19.8 lbs/day and 2.97 TPY.
	OAC rule 3745-21-07	See A.2.a.

2. Additional Terms and Conditions

- 2.a. No photochemically reactive materials (coatings and cleanup materials), as defined in OAC rule 3745-21-01, shall be utilized in the spray paint/stain booths (R004 -- R009) at this facility.
- 2.b. Federally enforceable emission limitations for total volatile organic compounds (VOC) and total hazardous air pollutants (HAPs) from spray paint/stain booths R004 through R009, inclusive, at this facility shall be as follows:
- Total VOC emissions shall not exceed 664 lbs/day and 99.5 TPY
 - ii. Total xylene emissions shall not exceed 49.4 lbs/day and 7.4 TPY;
 - iii. Total toluene emissions shall not exceed 20.4 lbs/day and 3.1 TPY; and
 - iv. Total HAPs emissions shall not exceed 78.8 lbs/day and 11.8 TPY.

B. Operational Restrictions

1. No more than twenty (20) gallons of coatings shall be employed in this emissions unit during any single day of operations.

B. Operational Restrictions (continued)

2. During the first twelve (12) months of operation under this permit, each of the emissions units listed in this permit (R004 through R009) shall not exceed the number of days of operation (25 per month) or the number of gallons of coating usage (500 gallons per month based on 25 days per month times 20 gallons of coatings allowed per day) specified for each month in the following table. After the first 12 months of operation, the monthly days of operation and volume of coatings used per emissions unit (R004 through R009) shall not exceed 300 days or 6000 gallons, respectively, for any rolling 12-month period.

CALENDAR MONTH(S) (AFTER PERMIT ISSUANCE)	CUMULATIVE ALLOWABLE OPERATING DAYS	CUMULATIVE ALLOWABLE GALLONS of COATING
1	25	500
2	50	1000
3	75	1500
4	100	2000
5	125	2500
6	150	3000
7	175	3500
8	200	4000
9	225	4500
10	250	5000
11	275	5500
12	300	6000

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record, on a daily basis, the following information for this emissions unit:
- the company identification for each coating and cleanup material employed;
 - documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - the number of gallons of each coating and cleanup material employed and the total number of gallons of all coatings employed;
 - the VOC content of each coating and cleanup material employed, in pounds per gallon;
 - the content of each HAP (xylene, toluene, and any other HAP) in each coating and cleanup material employed, in pounds per gallon;
 - the VOC emission rate for each coating and cleanup material employed, in pounds per day;
 - the total VOC emission rate for all coatings and cleanup materials employed, in pounds per day;
 - the total individual emission rates of xylene, toluene, and any other HAP from all coatings and cleanup materials employed, in pounds per day; and
 - the total emission rate of all HAPs collectively from all coatings and cleanup materials employed, in pounds per day.
- [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, on a daily basis, the following information for emissions units R004 through R009, as a group:
- the total VOC emission rate from all coatings and cleanup materials employed, in pounds per day;
 - the total individual emission rates of xylene, toluene, and any other HAP from all coatings and cleanup materials employed, in pounds per day; and
 - the total emission rate of all HAPs collectively from all coatings and cleanup materials employed, in pounds per day.

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

3. The permittee shall collect and record, on a monthly basis, the following information for each of emissions units R004 through R009:
 - a. the total number of days of operation;
 - b. the total number of gallons of coatings employed;
 - c. the cumulative totals of both the monthly hours of operation and the total number of gallons of coatings employed during the first twelve (12) months of operation under this permit; and
 - d. after the first year of operation under this permit, the rolling 12-month summations of both the total monthly hours of operation and the total monthly gallons of coatings employed.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the VOC emissions from the coatings and cleanup materials exceeded the allowable VOC emission rate for this emissions unit and/or for emissions units R004 through R009 combined, and the actual VOC emissions rate(s) for each such day.
 - b. An identification of each day during which the emission rate of xylene and/or toluene exceeded the specific allowable daily emission rates for this emissions unit and/or for emissions units R004 through R009 combined, and the actual emission rate(s) for each such day.
 - c. An identification of each day during which the total emission rate for all HAPs exceeded the allowable daily total HAP emission rate for this emissions unit and/or for emissions units R004 through R009 combined, and the actual daily emission rate(s) for each such day.
 - d. An identification of each day during which this emissions unit employed more than 20 gallons of coatings, and the actual gallons of coatings employed.
 - e. During the first 12 months of operation under this permit, an identification of each month during which the cumulative total days of operation and/or gallons of coatings employed by this emissions unit exceeded the allowable limitations of this permit, and the actual monthly totals of the days of operation and/or the gallons of coatings employed during that month.
 - f. After the first 12 months of operation under this permit, an identification of each month during which the rolling 12-month summations for the total days of operation and/or the gallons of coatings employed in this emissions unit exceeded the allowable limitations of this permit, and the actual rolling 12-month summations of the total days of operation and/or the gallons of coatings employed during that month.
2. The permittee shall also submit annual reports which specify the total VOC, total xylene, total toluene, and total HAPs emissions for this emissions unit and for emissions units R004 through R009 combined for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a. Emissions Limitations: Federally enforceable daily and annual VOC emissions shall not exceed 115.2 lbs/day and 17.3 TPY.

Applicable Compliance Method: Compliance with the daily and annual VOC emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the VOC emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 25 or 25a.

E. Testing Requirements (continued)

- 1.b. Emissions Limitations: Federally enforceable daily and annual xylene emissions shall not exceed 7.4 lbs/day and 1.11 TPY.

Applicable Compliance Method: Compliance with the daily and annual xylene emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the xylene emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 18.

- 1.c. Emissions Limitations: Federally enforceable daily and annual toluene emissions shall not exceed 10.2 lbs/yr and 1.53 TPY.

Applicable Compliance Method: Compliance with the daily and annual toluene emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the toluene emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 18.

- 1.d. Emissions Limitations: Federally enforceable daily and annual total HAPs emissions shall not exceed 19.8 lbs/day and 2.97 TPY.

Applicable Compliance Method: Compliance with the daily and annual total HAPs emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the total HAPs emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 18.

- 1.e Emission limitations for R004 through R009 combined, as specified in Section A.2.b:

Applicable Compliance Method: Compliance shall be based upon the record keeping in Section C.

F. Miscellaneous Requirements

1. Operation of these emissions units shall not be allowed to create a public nuisance.

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 12/03/98

Facility ID: 02-38-00-0150

Expiration Date: 12/03/03

FINAL ISSUE

This document constitutes issuance for:

Schrocks' Woodcrafts, Inc., Plant #2
4981 Township Road 401
Walnut Creek, OH 44654

of a permit to operate for:

R006 (2nd Top Coat Booth)
Spray booth for application of 2nd top coat (paint) to wood cabinets.

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

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

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

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

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Northeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Donald R. Schepers

Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2nd Top Coat Spray Booth (R006)	OAC Rule 3745-31-05 (PTI No. 02-11354)	a. The total volatile organic compound (VOC) emissions from this emissions unit shall not exceed 102.8 pounds per day (lbs/day) and 15.42 tons per year (TPY). b. Emissions of xylene from this emissions unit shall not exceed 7.6 lbs/day and 1.14 TPY. c. Total emissions of Hazardous Air Pollutants (HAPs) from this emissions unit shall not exceed 8.6 lbs/day and 1.29 TPY. See A.2.a.
	OAC rule 3745-21-07	

2. Additional Terms and Conditions

- 2.a. No photochemically reactive materials (coatings and cleanup materials), as defined in OAC rule 3745-21-01, shall be utilized in the spray paint/stain booths (R004 – R009) at this facility.
- 2.b. Federally enforceable emission limitations for total volatile organic compounds (VOC) and total hazardous air pollutants (HAPs) from spray paint/stain booths R004 through R009, inclusive, at this facility shall be as follows:
 - i. Total VOC emissions shall not exceed 664 lbs/day and 99.5 TPY;
 - ii. Total xylene emissions shall not exceed 49.4 lbs/day and 7.4 TPY;
 - iii. Total toluene emissions shall not exceed 20.4 lbs/day and 3.1 TPY; and
 - iv. Total HAPs emissions shall not exceed 78.8 lbs/day and 11.8 TPY.

B. Operational Restrictions

1. No more than twenty (20) gallons of coatings shall be employed in this emissions unit during any single day of operations.

B. Operational Restrictions (continued)

2. During the first twelve (12) months of operation under this permit, each of the emissions units listed in this permit (R004 through R009) shall not exceed the number of days of operation (25 per month) or the number of gallons of coating usage (500 gallons per month based on 25 days per month times 20 gallons of coatings allowed per day) specified for each month in the following table. After the first 12 months of operation, the monthly days of operation and volume of coatings used per emissions unit (R004 through R009) shall not exceed 300 days or 6000 gallons, respectively, for any rolling 12-month period.

CALENDAR MONTH(S) (AFTER PERMIT ISSUANCE)	CUMULATIVE ALLOWABLE OPERATING DAYS	CUMULATIVE ALLOWABLE GALLONS of COATING
1	25	500
2	50	1000
3	75	1500
4	100	2000
5	125	2500
6	150	3000
7	175	3500
8	200	4000
9	225	4500
10	250	5000
11	275	5500
12	300	6000

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record, on a daily basis, the following information for this emissions unit:
- the company identification for each coating and cleanup material employed;
 - documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - the number of gallons of each coating and cleanup material employed and the total number of gallons of all coatings employed;
 - the VOC content of each coating and cleanup material employed, in pounds per gallon;
 - the content of each HAP (xylene, toluene, and any other HAP) in each coating and cleanup material employed, in pounds per gallon;
 - the VOC emission rate for each coating and cleanup material employed, in pounds per day;
 - the total VOC emission rate for all coatings and cleanup materials employed, in pounds per day;
 - the total individual emission rates of xylene, toluene, and any other HAP from all coatings and cleanup materials employed, in pounds per day; and
 - the total emission rate of all HAPs collectively from all coatings and cleanup materials employed, in pounds per day.

[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, on a daily basis, the following information for emissions units R004 through R009, as a group:
- the total VOC emission rate from all coatings and cleanup materials employed, in pounds per day;
 - the total individual emission rates of xylene, toluene, and any other HAP from all coatings and cleanup materials employed, in pounds per day; and
 - the total emission rate of all HAPs collectively from all coatings and cleanup materials employed, in pounds per day.

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

3. The permittee shall collect and record, on a monthly basis, the following information for each of emissions units R004 through R009:
 - a. the total number of days of operation;
 - b. the total number of gallons of coatings employed;
 - c. the cumulative totals of both the monthly hours of operation and the total number of gallons of coatings employed during the first twelve (12) months of operation under this permit; and
 - d. after the first year of operation under this permit, the rolling 12-month summations of both the total monthly hours of operation and the total monthly gallons of coatings employed.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the VOC emissions from the coatings and cleanup materials exceeded the allowable VOC emission rate for this emissions unit and/or for emissions units R004 through R009 combined, and the actual VOC emissions rate(s) for each such day.
 - b. An identification of each day during which the emission rate of xylene and/or toluene exceeded the specific allowable daily emission rates for this emissions unit and/or for emissions units R004 through R009 combined, and the actual emission rate(s) for each such day.
 - c. An identification of each day during which the total emission rate for all HAPs exceeded the allowable daily total HAP emission rate for this emissions unit and/or for emissions units R004 through R009 combined, and the actual daily emission rate(s) for each such day.
 - d. An identification of each day during which this emissions unit employed more than 20 gallons of coatings, and the actual gallons of coatings employed.
 - e. During the first 12 months of operation under this permit, an identification of each month during which the cumulative total days of operation and/or gallons of coatings employed by this emissions unit exceeded the allowable limitations of this permit, and the actual monthly totals of the days of operation and/or the gallons of coatings employed during that month.
 - f. After the first 12 months of operation under this permit, an identification of each month during which the rolling 12-month summations for the total days of operation and/or the gallons of coatings employed in this emissions unit exceeded the allowable limitations of this permit, and the actual rolling 12-month summations of the total days of operation and/or the gallons of coatings employed during that month.
2. The permittee shall also submit annual reports which specify the total VOC, total xylene, and total HAPs emissions for this emissions unit and for emissions units R004 through R009 combined for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emissions limitations in section A. 1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a. Emissions Limitations: Federally enforceable daily and annual VOC emissions shall not exceed 102.8 lbs/day and 15.42 TPY.

Applicable Compliance Method: Compliance with the daily and annual VOC emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the VOC emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 25 or 25a.

E. Testing Requirements (continued)

- 1.b.** Emissions Limitations: Federally enforceable daily and annual xylene emissions shall not exceed 7.6 lbs/day and 1.14 TPY.

Applicable Compliance Method: Compliance with the daily and annual xylene emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the xylene emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 18.

- 1.c.** Emissions Limitations: Federally enforceable daily and annual total HAPs emissions shall not exceed 8.6 lbs/day and 1.29 TPY.

Applicable Compliance Method: Compliance with the daily and annual total HAPs emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the total HAPs emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 18.

- 1.e** Emission limitations for R004 through R009 combined, as specified in Section A.2.b:

Applicable Compliance Method: Compliance shall be based upon the record keeping in Section C.

F. Miscellaneous Requirements

1. Operation of these emissions units shall not be allowed to create a public nuisance.

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 12/03/98

Facility ID: 02-38-00-0150

Expiration Date: 12/03/03

FINAL ISSUE

This document constitutes issuance for:

Schrocks' Woodcrafts, Inc., Plant #2
4981 Township Road 401
Walnut Creek, OH 44654

of a permit to operate for:

R007 (1st Top Coat Booth)
Spray booth for application of 1st top coat (paint) to wood cabinets.

1 Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

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

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

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

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Northeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
1st Top Coat Spray Booth (R007)	OAC Rule 3745-31-05 (PTI No. 02-11354)	a. The total volatile organic compound (VOC) emissions from this emissions unit shall not exceed 102.8 pounds per day (lbs/day) and 15.42 tons per year (TPY). b. Emissions of xylene from this emissions unit shall not exceed 7.6 lbs/day and 1.14 TPY. c. Total emissions of Hazardous Air Pollutants (HAPs) from this emissions unit shall not exceed 8.6 lbs/day and 1.29 TPY. See A.2.a.
	OAC rule 3745-21-07	

2. Additional Terms and Conditions

- 2.a. No photochemically reactive materials (coatings and cleanup materials), as defined in OAC rule 3745-21-01, shall be utilized in the spray paint/stain booths (R004 – R009) at this facility.
- 2.b. Federally enforceable emission limitations for total volatile organic compounds (VOC) and total hazardous air pollutants (HAPs) from spray paint/stain booths R004 through R009, inclusive, at this facility shall be as follows:
 - i. Total VOC emissions shall not exceed 664 lbs/day and 99.5 TPY;
 - ii. Total xylene emissions shall not exceed 49.4 lbs/day and 7.4 TPY;
 - iii. Total toluene emissions shall not exceed 20.4 lbs/day and 3.1 TPY; and
 - iv. Total HAPs emissions shall not exceed 78.8 lbs/day and 11.8 TPY.

B. Operational Restrictions

1. No more than twenty (20) gallons of coatings shall be employed in this emissions unit during any single day of operations.

B. Operational Restrictions (continued)

2. During the first twelve (12) months of operation under this permit, each of the emissions units listed in this permit (R004 through R009) shall not exceed the number of days of operation (25 per month) or the number of gallons of coating usage (500 gallons per month based on 25 days per month times 20 gallons of coatings allowed per day) specified for each month in the following table. After the first 12 months of operation, the monthly days of operation and volume of coatings used per emissions unit (R004 through R009) shall not exceed 300 days or 6000 gallons, respectively, for any rolling 12-month period.

CALENDAR MONTH(S) (AFTER PERMIT ISSUANCE)	CUMULATIVE ALLOWABLE OPERATING DAYS	CUMULATIVE ALLOWABLE GALLONS of COATING
1	25	500
2	50	1000
3	75	1500
4	100	2000
5	125	2500
6	150	3000
7	175	3500
8	200	4000
9	225	4500
10	250	5000
11	275	5500
12	300	6000

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record, on a daily basis, the following information for this emissions unit:
- a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed and the total number of gallons of all coatings employed;
 - d. the VOC content of each coating and cleanup material employed, in pounds per gallon;
 - e. the content of each HAP (xylene, toluene, and any other HAP) in each coating and cleanup material employed, in pounds per gallon;
 - f. the VOC emission rate for each coating and cleanup material employed, in pounds per day;
 - g. the total VOC emission rate for all coatings and cleanup materials employed, in pounds per day;
 - h. the total individual emission rates of xylene, toluene, and any other HAP from all coatings and cleanup materials employed, in pounds per day; and
 - i. the total emission rate of all HAPs collectively from all coatings and cleanup materials employed, in pounds per day.

[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, on a daily basis, the following information for emissions units R004 through R009, as a group:
- a. the total VOC emission rate from all coatings and cleanup materials employed, in pounds per day;
 - b. the total individual emission rates of xylene, toluene, and any other HAP from all coatings and cleanup materials employed, in pounds per day; and
 - c. the total emission rate of all HAPs collectively from all coatings and cleanup materials employed, in pounds per day.

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

3. The permittee shall collect and record, on a monthly basis, the following information for each of emissions units R004 through R009:
 - a. the total number of days of operation;
 - b. the total number of gallons of coatings employed;
 - c. the cumulative totals of both the monthly hours of operation and the total number of gallons of coatings employed during the first twelve (12) months of operation under this permit; and
 - d. after the first year of operation under this permit, the rolling 12-month summations of both the total monthly hours of operation and the total monthly gallons of coatings employed.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the VOC emissions from the coatings and cleanup materials exceeded the allowable VOC emission rate for this emissions unit and/or for emissions units R004 through R009 combined, and the actual VOC emissions rate(s) for each such day.
 - b. An identification of each day during which the emission rate of xylene and/or toluene exceeded the specific allowable daily emission rates for this emissions unit and/or for emissions units R004 through R009 combined, and the actual emission rate(s) for each such day.
 - c. An identification of each day during which the total emission rate for all HAPs exceeded the allowable daily total HAP emission rate for this emissions unit and/or for emissions units R004 through R009 combined, and the actual daily emission rate(s) for each such day.
 - d. An identification of each day during which this emissions unit employed more than 20 gallons of coatings, and the actual gallons of coatings employed.
 - e. During the first 12 months of operation under this permit, an identification of each month during which the cumulative total days of operation and/or gallons of coatings employed by this emissions unit exceeded the allowable limitations of this permit, and the actual monthly totals of the days of operation and/or the gallons of coatings employed during that month.
 - f. After the first 12 months of operation under this permit, an identification of each month during which the rolling 12-month summations for the total days of operation and/or the gallons of coatings employed in this emissions unit exceeded the allowable limitations of this permit, and the actual rolling 12-month summations of the total days of operation and/or the gallons of coatings employed during that month.
2. The permittee shall also submit annual reports which specify the total VOC, total xylene, and total HAPs emissions for this emissions unit and for emissions units R004 through R009 combined for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a. Emissions Limitations: Federally enforceable daily and annual VOC emissions shall not exceed 102.8 lbs/day and 15.42 TPY.

Applicable Compliance Method: Compliance with the daily and annual VOC emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the VOC emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 25 or 25a.

E. Testing Requirements (continued)

- 1.b. Emissions Limitations: Federally enforceable daily and annual xylene emissions shall not exceed 7.6 lbs/day and 1.14 TPY.

Applicable Compliance Method: Compliance with the daily and annual xylene emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the xylene emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 18.

- 1.c. Emissions Limitations: Federally enforceable daily and annual total HAPs emissions shall not exceed 8.6 lbs/day and 1.29 TPY.

Applicable Compliance Method: Compliance with the daily and annual total HAPs emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the total HAPs emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 18.

- 1.d Emission limitations for R004 through R009 combined, as specified in Section A.2.b:

Applicable Compliance Method: Compliance shall be based upon the record keeping in Section C.

F Miscellaneous Requirements

1. Operation of these emissions units shall not be allowed to create a public nuisance.

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 12/03/98

Facility ID: 02-38-00-0150

Expiration Date 12/03/03

FINAL ISSUE

This document constitutes issuance for:

Schrocks' Woodcrafts, Inc., Plant #2
4981 Township Road 401
Walnut Creek, OH 44654

of a permit to operate for:

R005 (Off Line Stain Booth)
Spray booth for application of stain (off line) to wood cabinets.

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

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

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

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

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Northeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Donald R. Heberich

Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Off Line Stain Spray Booth (R005)	OAC rule 3745-31-05 (PTI No. 02-11354)	a. The total volatile organic compound (VOC) emissions from this emissions unit shall not exceed 120.0 pounds per day (lbs/day) and 18.0 tons per year (TPY). b. Emissions of xylene from this emissions unit shall not exceed 9.6 lbs/day and 1.44 TPY. c. Emissions of toluene from this emissions unit shall not exceed 10.2 lbs/day and 1.53 TPY. d. Total emissions of Hazardous Air Pollutants (HAPs) from this emissions unit shall not exceed 22.0 lbs/day and 3.30 TPY. See A.2.a.
	OAC rule 3745-21-07	

2. Additional Terms and Conditions

- 2.a. No photochemically reactive materials (coatings and cleanup materials), as defined in OAC rule 3745-21-01, shall be utilized in the spray paint/stain booths (R004 – R009) at this facility.
- 2.b. Federally enforceable emission limitations for total volatile organic compounds (VOC) and total hazardous air pollutants (HAPs) from spray paint/stain booths R004 through R009, inclusive, at this facility shall be as follows:
 - Total VOC emissions shall not exceed 664 lbs/day and 99.5 TPY;
 - ii Total xylene emissions shall not exceed 49.4 lbs/day and 7.4 TPY;
 - Total toluene emissions shall not exceed 20.4 lbs/day and 3.1 TPY; and
 - Total HAPs emissions shall not exceed 78.8 lbs/day and 11.8 TPY.

B. Operational Restrictions

1. No more than twenty (20) gallons of coatings shall be employed in this emissions unit during any single day of operations.

B. Operational Restrictions (continued)

2. During the first twelve (12) months of operation under this permit, each of the emissions units listed in this permit (R004 through R009) shall not exceed the number of days of operation (25 per month) or the number of gallons of coating usage (500 gallons per month based on 25 days per month times 20 gallons of coatings allowed per day) specified for each month in the following table. After the first 12 months of operation, the monthly days of operation and volume of coatings used per emissions unit (R004 through R009) shall not exceed 300 days or 6000 gallons, respectively, for any rolling 12-month period.

CALENDAR MONTH(S) (AFTER PERMIT ISSUANCE)	CUMULATIVE ALLOWABLE OPERATING DAYS	CUMULATIVE ALLOWABLE GALLONS of COATING
1	25	500
2	50	1000
3	75	1500
4	100	2000
5	125	2500
6	150	3000
7	175	3500
8	200	4000
9	225	4500
10	250	5000
11	275	5500
12	300	6000

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record, on a daily basis, the following information for this emissions unit:
- a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed and the total number of gallons of all coatings employed;
 - d. the VOC content of each coating and cleanup material employed, in pounds per gallon;
 - e. the content of each HAP (xylene, toluene, and any other HAP) in each coating and cleanup material employed, in pounds per gallon;
 - f. the VOC emission rate for each coating and cleanup material employed, in pounds per day;
 - g. the total VOC emission rate for all coatings and cleanup materials employed, in pounds per day;
 - h. the total individual emission rates of xylene, toluene, and any other HAP from all coatings and cleanup materials employed, in pounds per day; and
 - i. the total emission rate of all HAPs collectively from all coatings and cleanup materials employed, in pounds per day.

[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, on a daily basis, the following information for emissions units R004 through R009, as a group:
- a. the total VOC emission rate from all coatings and cleanup materials employed, in pounds per day;
 - b. the total individual emission rates of xylene, toluene, and any other HAP from all coatings and cleanup materials employed, in pounds per day; and
 - c. the total emission rate of all HAPs collectively from all coatings and cleanup materials employed, in pounds per day.

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

3. The permittee shall collect and record, on a monthly basis, the following information for each of emissions units R004 through R009:
 - a. the total number of days of operation;
 - b. the total number of gallons of coatings employed;
 - c. the cumulative totals of both the monthly hours of operation and the total number of gallons of coatings employed during the first twelve (12) months of operation under this permit; and
 - d. after the first year of operation under this permit, the rolling 12-month summations of both the total monthly hours of operation and the total monthly gallons of coatings employed.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the VOC emissions from the coatings and cleanup materials exceeded the allowable VOC emission rate for this emissions unit and/or for emissions units R004 through R009 combined, and the actual VOC emissions rate(s) for each such day.
 - b. An identification of each day during which the emission rate of xylene and/or toluene exceeded the specific allowable daily emission rates for this emissions unit and/or for emissions units R004 through R009 combined, and the actual emission rate(s) for each such day.
 - c. An identification of each day during which the total emission rate for all HAPs exceeded the allowable daily total HAP emission rate for this emissions unit and/or for emissions units R004 through R009 combined, and the actual daily emission rate(s) for each such day.
 - d. An identification of each day during which this emissions unit employed more than 20 gallons of coatings, and the actual gallons of coatings employed.
 - e. During the first 12 months of operation under this permit, an identification of each month during which the cumulative total days of operation and/or gallons of coatings employed by this emissions unit exceeded the allowable limitations of this permit, and the actual monthly totals of the days of operation and/or the gallons of coatings employed during that month.
 - f. After the first 12 months of operation under this permit, an identification of each month during which the rolling 12-month summations for the total days of operation and/or the gallons of coatings employed in this emissions unit exceeded the allowable limitations of this permit, and the actual rolling 12-month summations of the total days of operation and/or the gallons of coatings employed during that month.
2. The permittee shall also submit annual reports which specify the total VOC, total xylene, total toluene, and total HAPs emissions for this emissions unit and for emissions units R004 through R009 combined for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a. Emissions Limitations: Federally enforceable daily and annual VOC emissions shall not exceed 120.0 lbs/day and 18.0 TPY.

Applicable Compliance Method: Compliance with the daily and annual VOC emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the VOC emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 25 or 25a.

E. Testing Requirements (continued)

- 1.b. Emissions Limitations: Federally enforceable daily and annual xylene emissions shall not exceed 9.6 lbs/day and 1.44 TPY.

Applicable Compliance Method: Compliance with the daily and annual xylene emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the xylene emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 18.

- 1.c. Emissions Limitations: Federally enforceable daily and annual toluene emissions shall not exceed 10.2 lbs/yr and 1.53 TPY.

Applicable Compliance Method: Compliance with the daily and annual toluene emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the toluene emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 18.

Emissions Limitations: Federally enforceable daily and annual total HAPs emissions shall not exceed 22.0 lbs/day and 3.30 TPY.

Applicable Compliance Method: Compliance with the daily and annual total HAPs emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the total HAPs emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 18.

- 1.e Emission limitations for R004 through R009 combined, as specified in Section A.2.b:

Applicable Compliance Method: Compliance shall be based upon the record keeping in Section C.

F. Miscellaneous Requirements

1. Operation of these emissions units shall not be allowed to create a public nuisance.

PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 12/03/98

Facility ID: 02-38-00-0150

Expiration Date: 12/03/03

FINAL ISSUE

This document constitutes issuance for:

Schrocks' Woodcrafts, Inc., Plant #2
4981 Township Road 401
Walnut Creek, OH 44654

of a permit to operate for:

R004 (Off Line Top Coat Booth)
Spray booth for application of off line top coat (paint) to wood cabinets.

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

3. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

4. Records Retention Requirements

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

5. Inspections and Information Requests

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

6. Scheduled Maintenance/Malfunction Reporting

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

7. Permit Transfers

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

8. Air Pollution Nuisance

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

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

10. The permittee is also subject to the attached special terms and conditions.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

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

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the Northeast District Office.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Donald R. DeGardner

Director

Part II: Special Terms and Conditions

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Off Line Top Coat Spray Booth (R004)	OAC Rule 3745-31-05 (PTI No. 02-11354)	a. The total volatile organic compound (VOC) emissions from this emissions unit shall not exceed 102.8 pounds per day (lbs/day) and 15.42 tons per year (TPY). b. Emissions of xylene from this emissions unit shall not exceed 7.6 lbs/day and 1.14 TPY. c. Total emissions of Hazardous Air Pollutants (HAPs) from this emissions unit shall not exceed 8.6 lbs/day and 1.29 TPY.
	OAC rule 3745-21-07	See A.2.a.

2. Additional Terms and Conditions

- 2.a. No photochemically reactive materials (coatings and cleanup materials), as defined in OAC rule 3745-21-01, shall be utilized in the spray paint/stain booths (R004 – R009) at this facility.
- 2.b. Federally enforceable emission limitations for total volatile organic compounds (VOC) and total hazardous air pollutants (HAPs) from spray paint/stain booths R004 through R009, inclusive, at this facility shall be as follows:
 - Total VOC emissions shall not exceed 664 lbs/day and 99.5 TPY;
 - ii. Total xylene emissions shall not exceed 49.4 lbs/day and 7.4 TPY;
 - iii. Total toluene emissions shall not exceed 20.4 lbs/day and 3.1 TPY; and
 - iv. Total HAPs emissions shall not exceed 78.8 lbs/day and 11.8 TPY.

B. Operational Restrictions

1. No more than twenty (20) gallons of coatings shall be employed in this emissions unit during any single day of operations.

B. Operational Restrictions (continued)

2. During the first twelve (12) months of operation under this permit, each of the emissions units listed in this permit (R004 through R009) shall not exceed the number of days of operation (25 per month) or the number of gallons of coating usage (500 gallons per month based on 25 days per month times 20 gallons of coatings allowed per day) specified for each month in the following table. After the first 12 months of operation, the monthly days of operation and volume of coatings used per emissions unit (R004 through R009) shall not exceed 300 days or 6000 gallons, respectively, for any rolling 12-month period.

CALENDAR MONTH(S) (AFTER PERMIT ISSUANCE)	CUMULATIVE ALLOWABLE OPERATING DAYS	CUMULATIVE ALLOWABLE GALLONS OF COATING
1	25	500
2	50	1000
3	75	1500
4	100	2000
5	125	2500
6	150	3000
7	175	3500
8	200	4000
9	225	4500
10	250	5000
11	275	5500
12	300	6000

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record, on a daily basis, the following information for this emissions unit:
- a. the company identification for each coating and cleanup material employed;
 - b. documentation on whether or not each coating and cleanup material is a photochemically reactive material;
 - c. the number of gallons of each coating and cleanup material employed and the total number of gallons of all coatings employed;
 - d. the VOC content of each coating and cleanup material employed, in pounds per gallon;
 - e. the content of each HAP (xylene, toluene, and any other HAP) in each coating and cleanup material employed, in pounds per gallon;
 - f. the VOC emission rate for each coating and cleanup material employed, in pounds per day;
 - g. the total VOC emission rate for all coatings and cleanup materials employed, in pounds per day;
 - h. the total individual emission rates of xylene, toluene, and any other HAP from all coatings and cleanup materials employed, in pounds per day; and
 - i. the total emission rate of all HAPs collectively from all coatings and cleanup materials employed, in pounds per day.

[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, on a daily basis, the following information for emissions units R004 through R009, as a group:
- a. the total VOC emission rate from all coatings and cleanup materials employed, in pounds per day;
 - b. the total individual emission rates of xylene, toluene, and any other HAP from all coatings and cleanup materials employed, in pounds per day; and
 - c. the total emission rate of all HAPs collectively from all coatings and cleanup materials employed, in pounds per day.

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

3. The permittee shall collect and record, on a monthly basis, the following information for each of emissions units R004 through R009:
 - a. the total number of days of operation;
 - b. the total number of gallons of coatings employed
 - c. the cumulative totals of both the monthly hours of operation and the total number of gallons of coatings employed during the first twelve (12) months of operation under this permit; and
 - d. after the first year of operation under this permit, the rolling 12-month summations of both the total monthly hours of operation and the total monthly gallons of coatings employed.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the VOC emissions from the coatings and cleanup materials exceeded the allowable VOC emission rate for this emissions unit and/or for emissions units R004 through R009 combined, and the actual VOC emissions rate(s) for each such day.
 - b. An identification of each day during which the emission rate of xylene and/or toluene exceeded the specific allowable daily emission rates for this emissions unit and/or for emissions units R004 through R009 combined, and the actual emission rate(s) for each such day.
 - c. An identification of each day during which the total emission rate for all HAPs exceeded the allowable daily total HAP emission rate for this emissions unit and/or for emissions units R004 through R009 combined, and the actual daily emission rate(s) for each such day.
 - d. An identification of each day during which this emissions unit employed more than 20 gallons of coatings, and the actual gallons of coatings employed.
 - e. During the first 12 months of operation under this permit, an identification of each month during which the cumulative total days of operation and/or gallons of coatings employed by this emissions unit exceeded the allowable limitations of this permit, and the actual monthly totals of the days of operation and/or the gallons of coatings employed during that month.
 - f. After the first 12 months of operation under this permit, an identification of each month during which the rolling 12-month summations for the total days of operation and/or the gallons of coatings employed in this emissions unit exceeded the allowable limitations of this permit, and the actual rolling 12-month summations of the total days of operation and/or the gallons of coatings employed during that month.
2. The permittee shall also submit annual reports which specify the total VOC, total xylene, total toluene, and total HAPs emissions for this emissions unit and for emissions units R004 through R009 combined for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a. Emissions Limitations: Federally enforceable daily and annual VOC emissions shall not exceed 102.8 lbs/day and 15.42 TPY.

Applicable Compliance Method: Compliance with the daily and annual VOC emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the VOC emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 25 or 25a.

E. Testing Requirements (continued)

- 1.b. Emissions Limitations: Federally enforceable daily and annual xylene emissions shall not exceed 7.6 lbs/day and 1.14 TPY.

Applicable Compliance Method: Compliance with the daily and annual xylene emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the xylene emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 18.

- 1.c Emissions Limitations: Federally enforceable daily and annual total HAPs emissions shall not exceed 8.6 lbs/day and 1.29 TPY.

Applicable Compliance Method: Compliance with the daily and annual total HAPs emission limitations for this emissions unit shall be based on calculations utilizing daily operations and coatings/cleanup materials data collected and recorded as required in Section C. If required pursuant to OAC 3745-15-04, the permittee shall demonstrate compliance with the total HAPs emissions limits of this permit by means of physical testing of the effluent from this emissions unit in accordance with testing procedures listed in 40 CFR Part 60, "Standards of Performance for New Stationary Sources", Appendix A, Method 18.

- 1.d Emission limitations for R004 through R009 combined, as specified in Section A.2.b:

Applicable Compliance Method: Compliance shall be based upon the record keeping in Section C.

F. Miscellaneous Requirements

1. Operation of these emissions units shall not be allowed to create a public nuisance.