OhioEPA

State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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

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

04/30/03

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

06-40-01-0020
Merillat Industries Inc.
Robert S. Allen
960 E. Main Street
P.O. Box 625
Jackson, OH 45640

Dear Robert S. Allen:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of 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 Southeast District Office.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Southeast District Office
File, DAPC PMU

State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: **04/30/03**	Effective Date: **05/21/03**	Expiration Date: **05/21/08**

This document constitutes issuance of a Title V permit for Facility ID: 06-40-01-0020 to:
Merillat Industries Inc.
960 E. Main Street
P.O. Box 625
Jackson, OH 45640

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

B002 (Wood Fired Fire Tube Boiler)
Process boiler used for space heat and for conditioning of lumber

B003 (Backup Boiler)
Natural gas boiler used to supplement the woodwaste boiler

K002 (Rollcoater Finishing System)
Surface coating of wood kitchen cabinet components with solvent based and UV coatings

K003 (Molding Finishing System)
System for the finishing of cabinet molding components

P005 (Wood Working System)
Planers, saws, molders, drilling machines used to machine wood into cabinet components

P007 (Lumber Planer)
Planer for surfacing lumber to uniform thickness in preparation for drying

P008 (Fletcher #1)
Edgestain application and route underside

P009 (Fletcher #2)
Edgestain application and route underside

R001 (Spray Booth)
Spray booth for coating the inside of cabinet frames.

R007 (Stain, Seal, & Topcoaters and Dryers)
Surface coating of wood kitchen cabinet components

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

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

Southeast District Office
2195 Front Street
Logan, OH 43138
(740) 385-8501

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

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

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

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

(a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii)

pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) ,(ii) and (iii))

(b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))

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

period, the permittee shall submit a semi-annual report which states that no deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit(s) or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

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

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

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

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

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

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

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after

promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

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

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

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

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

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

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

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

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

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
ii. Compliance certifications shall include the following:
(a) An identification of each term or condition of this permit that is the basis of the certification.
(b) The permittee's current compliance status.
(c) Whether compliance was continuous or intermittent.
(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

13. Permit Shield

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

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

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

14. Operational Flexibility

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

15. Emergencies

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

16. Off-Permit Changes

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

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

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

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

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

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

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

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

17. Compliance Method Requirements

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

18. Insignificant Activities

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

19. Permit to Install Requirement

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

20. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

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

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations,

operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. Records Retention Requirements

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

3. Inspections and Information Requests

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

4. Scheduled Maintenance/Malfunction Reporting

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

5. Permit Transfers

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

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. [63.800(b)(3)]
This facility shall be designated as an area source for the purposes of 40 CFR Part 63, Subpart JJ and shall not be subject to any other provision of Subpart JJ if the permittee uses materials containing no more than 5 tons of any one hazardous air pollutant (HAP) per rolling, 12-month period or no more than 12.5 tons of any combination of HAP per rolling, 12-month period, including materials from source categories other than wood furniture; and at least 90 percent of the plantwide emissions per rolling, 12-month period are associated with the manufacture of wood furniture or wood furniture components.

[63.800(e)]
If the permittee uses materials containing more than 5 tons of any one HAP per rolling, 12-month period or more than 12.5 tons of any combination of HAP per rolling, 12-month period, including materials from source categories other than wood furniture, then this facility becomes a major source and must comply with the requirements of 40 CFR Part 60, Subpart JJ within 1 year after becoming a major source.

2. The permittee shall collect and record the following information each month for the facility:

a. the total number of gallons used for each of the finishing, gluing, cleaning, and washoff materials employed and certified product data sheets for these materials and the other records necessary to document emissions from all the source categories other than wood furniture;

b. the individual HAP and combined HAPs contents for each of the finishing, gluing, cleaning, and washoff materials employed;

c. the monthly total individual HAP used in all finishing, all gluing, all cleaning, and all washoff materials, in gallons (by category);

d. the monthly total combined HAPs used in all finishing, all gluing, all cleaning, and all washoff materials, in gallons (by category);

e. the monthly individual HAP and total combined HAPs used in all the source categories other than wood furniture;

f. the calculated total monthly individual HAP emissions (including cleanup emissions) for the entire facility, as of the last day of each calendar month, in tons;

g. the calculated total monthly combined HAPs emissions (including cleanup emissions) for the entire facility, as of the last day of each calendar month, in tons;

h. the calculated total rolling, 12-month individual HAP emissions (including cleanup emissions) for the entire facility, as of the last day of each calendar month, in tons; and

i. the calculated total rolling, 12-month combined HAPs emissions (including cleanup emissions) for the entire facility, as of the last day of each calendar month, in tons.

The permittee shall maintain the calculations required in this section for each month. These records shall be submitted to the Ohio EPA, Southeast District Office upon request and shall be maintained for 5 years.

3. The permittee shall notify the Ohio EPA, Southeast District Office in writing of any monthly record that identifies that more than 5 tons of any one hazardous air pollutant (HAP) per rolling, 12-month period or more than 12.5 tons of any combination of HAPs per rolling, 12-month period were employed, including materials from source categories other than wood furniture. The notification shall include a copy of such record and calculations, and shall be sent to the Ohio EPA, Southeast District Office within 30 days following the end of the calendar month.

B. State Only Enforceable Section

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

P002 - pre-dry kiln rooms;
P003 - kiln # 1 (rooms 1 and 2);
P004 - kiln # 2 (rooms 3 and 4); and
P006 - lower boiler feed system.

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Woodwaste Boiler (B002)

Activity Description: Process boiler used for space heat and for conditioning of lumber

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
wood-fired fire tube boiler with a maximum heat input of 21.5 million Btu/hr (derated from 29.5 million Btu/hr), controlled with a multiclone	OAC rule 3745-31-05(A)(3) (PTI 06-1103)	Particulate emissions shall not exceed 37.5 tpy. See section A.I.2.a.
	OAC rule 3745-17-10(B)(3) (derated)	See sections A.I.2.b and A.II.1.
	OAC rule 3745-17-10(C)(1)	Particulate emissions shall not exceed 0.32 pound per million Btu of actual heat input.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B)(3), 3745-17-10(C)(1), and 3745-17-07(A).

2.b Pursuant to OAC rule 3745-17-10, the total heat input for emissions unit B002 is derated from 29.5 million Btu/hr to 21.5 million Btu/hr. The derated total heat input of 21.5 million Btu/hr corresponds to a steam load of 18,000 lbs/hr. Using the derated total heat input, the allowable particulate emissions rate for emissions unit B002, from Figure I (curve P-1) of OAC rule 3745-17-10, is 0.32 lb/million Btu of actual heat input.

II. Operational Restrictions

1. At no time shall the steam flow rate from emissions unit B002 exceed 18,000 lbs/hr (as an average over any 1-hour period).

2. The permittee shall operate this emissions unit with the multiclone in good operating condition at all times.

II. Operational Restrictions (continued)

3. The permittee may employ a mixed waste fuel consisting of woodwaste and shredded mixed paper (excluding sandpaper) only if the shredded mixed paper does not exceed 0.25 percent at any time, by weight, of the total fuel burned and the shredded mixed paper is mixed with the woodwaste and fed into the boiler through the existing woodwaste feed system.

The permittee may employ a mixed waste fuel consisting of woodwaste and shredded sandpaper if the shredded sandpaper is fed through the existing fuel feed system in the same manner as during the particulate emission compliance test. The shredded sandpaper can not exceed 0.67 percent, by weight, of the total fuel burned.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall continuously monitor and record the steam flow rate from this emissions unit. (Copies of all steam flow rate charts shall be maintained for a period of 5 years, and shall be available for review during normal business hours by personnel from the Ohio EPA, Southeast District Office upon verbal or written request.)

2. Whenever shredded mixed paper or sandpaper are burned in this emissions unit, the permittee shall maintain hourly records that include the following information:

a. the pounds of woodwaste burned;

b. the pounds of shredded mixed paper burned;

c. the percent, by weight, of mixed paper in the fuel;

d. the pounds of shredded sandpaper burned; and

e. the percent, by weight, of sandpaper in the fuel.

3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

4. Notwithstanding the frequency of reporting requirements specified in section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

a. for 1 full quarter the facility's visual observations indicate no visible emissions; and

b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section A.III.3.

The permittee shall revert to daily readings if any visible emissions are observed.

5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #06-1103, issued on 12/24/86. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. If for any reason the steam flow rate from emissions unit B002 exceeds 18,000 lbs/hr, the following information shall be reported within 5 business days after the exceedance:

a. the date of the exceedance;

b. the time interval over which the exceedance occurred;

c. the value of the exceedance;

d. the cause(s) of the exceedance;

e. the corrective action which has been or will be taken to prevent similar exceedances in the future; and

f. a copy of the steam chart which shows the exceedance.

2. The permittee shall submit quarterly deviation (excursion) reports that identify any time during which the shredded mixed paper exceeds 0.25 percent, by weight, of the total fuel burned, and the actual percent, by weight, of shredded mixed paper for each such occurrence.

The permittee shall submit quarterly deviation (excursion) reports that identify any time during which the shredded sandpaper exceeds 0.67 percent, by weight, of the total fuel burned, and the actual percent, by weight, of shredded sandpaper for each such occurrence.

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

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #06-1103, issued on 12/24/86. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

Particulate emissions shall not exceed 0.32 pound per million Btu of actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

1.b Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

V. Testing Requirements (continued)

1.c Emission Limitation:

Particulate emissions shall not exceed 37.5 tpy.

Applicable Compliance Method:

The particulate emission limitation, in tpy, was determined by multiplying the allowable particulate emission limitation of 0.32 lb/million Btu by the derated total heat input of 21.5 million Btu/hr and by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. As long as compliance with the short term limit of 0.32 lb/million Btu is maintained, it will be assumed that compliance is also maintained with the tpy limit.

1.d Operational Restriction:

18,000 lbs/hr (average) of steam load

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirement specified in section A.III.1.

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

a. The emission testing shall be conducted within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.

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

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

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

3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-1103, issued on 12/24/86. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Backup Boiler (B003)

Activity Description: Natural gas boiler used to supplement the woodwaste boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
15 million Btu/hr natural gas and no. 2 fuel oil-fired backup boiler	OAC rule 3745-31-05(A)(3) (PTI 06-1731)	See section A.I.2.a.
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-18-06(C)	Sulfur dioxide (SO2) emissions shall not exceed 1.6 pounds per million Btu of actual heat input while burning no. 2 fuel oil.

2. Additional Terms and Conditions

2.a The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-10(B)(1), 3745-17-07(A), and 3745-18-06(C).

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or no. 2 fuel oil in this emissions unit.

2. The quality of the oil burned in this emissions unit shall meet the following specifications on an as-received basis:

i. a sulfur content which is sufficient to comply with the allowable SO2 emission limitation of 1.6 pounds of SO2 per million Btu of actual heat input; and

ii. a heat content greater than 150,000 Btu per gallon of oil.

Compliance with the above-mentioned specifications shall be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil.

III. Monitoring and/or Record Keeping Requirements

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO2 emission rate, in pounds per million Btu.

The permittee shall collect or require the oil supplier to collect a representative grab sample or receive certification from the oil supplier for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Ohio EPA, Southeast District Office.

2. The permittee shall maintain monthly records of the following information:

a. the total fuel oil usage, in gallons; and

b. the total natural gas usage, in millions of cubic feet.

3. For each day when the permittee burns a fuel other than natural gas and/or no. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #06-1731, issued on 1/16/87. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:

a. the total quantity of oil received in each shipment (gallons); and

b. the calculated sulfur dioxide emission rate (pounds/million Btu) for each shipment of oil received during the calendar month.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the oil shipments received during the previous calendar quarters.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or no. 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #06-1731, issued on 1/16/87. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

V. Testing Requirements (continued)

1.a Emission Limitation:

Particulate emissions shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

1.b Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

1.c Emission Limitation:

SO2 emissions shall not exceed 1.6 pounds per million Btu of actual heat input while burning fuel oil.

Applicable Compliance Method:

Compliance shall be demonstrated by calculating the SO2 emissions for each shipment of oil using the emission factor specified in AP-42 (Fuel Oil Combustion, Table 1.3-1, 10/86) and the following equation (where S is the actual weight % of sulfur in the fuel):

157 (S) lbs SO2/1000 gal X 1/actual heat content (million Btu/1000 gal) = lbs SO2/million Btu

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 6.

1.d The quality of the oil burned in this emissions unit shall meet the following specifications on an as-received basis:

i. a sulfur content which is sufficient to comply with the allowable SO2 emission limitation of 1.6 pounds of SO2 per million Btu of actual heat input; and

ii. a heat content greater than 150,000 Btu per gallon of oil.

Compliance with the above-mentioned specifications shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-1731, issued on 1/16/87. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Rollcoater #2 (K002)

Activity Description: Surface coating of wood kitchen cabinet components with solvent based and UV coatings

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Rollcoater Finishing System (consisting of rollcoaters #1, #2, #3 and an edge coater) controlled with a regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) (PTI 06-3776)	Volatile organic compound (VOC) emissions shall not exceed 1.47 lbs/hr. VOC emissions shall not exceed 6.45 tons per year. Ninety-five percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide. See sections A.I.2.a and A.I.2.b.
	OAC rule 3745-21-07(G)(2)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07(G)(6)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.

2. Additional Terms and Conditions

2.a Rollcoaters #2 and #3 and the edge coater shall employ coatings with a VOC content that does not exceed 0.5 pound per gallon of coating.

2.b Rollcoater #1 shall employ coatings with a VOC content that does not exceed 7.5 pounds per gallon of coating and at a usage rate that does not exceed 10,950 gallons per year (source maximum capacity). Rollcoater #1 shall be totally enclosed with 100% capture efficiency (natural draft openings (NDO) velocities shall be greater than or equal to 200 fpm) and vented to an incinerator with at least 95% destruction efficiency.

2. Additional Terms and Conditions (continued)

2.c The VOC emissions from this emissions unit (from coatings and cleanup materials) shall be controlled through the application of a permanent total enclosure (PTE) with a 100% capture efficiency and a RTO system with a 95% removal/destruction efficiency. The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation, unless the permittee is successful in making the demonstration described below:

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

II. Operational Restrictions

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

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

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

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

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

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

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

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

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

III. Monitoring and/or Record Keeping Requirements

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

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

2. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance, and the cause(s) and remedial action(s) taken; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation, and the cause(s) and remedial action(s) taken.

3. The permittee shall collect and record the following information for each day for the coating operation:

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

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

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

d. the VOC content of each coating employed in rollcoaters #2 and #3;

e. the VOC content of each coating employed in rollcoater #1;

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

g. the total number of hours the emissions unit was in operation; and

h. the average hourly controlled VOC emission rate for all coatings and cleanup materials, i.e., (f)/(g), in pounds per hour (average).

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

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

5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #06-3776, issued on 10/27/93. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified above, and the cause(s) and remedial action(s) taken.

2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation in addition to the cause(s) and remedial action(s) taken. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

IV. Reporting Requirements (continued)

3. The permittee shall notify the Ohio EPA, Southeast District Office in writing of any daily record showing the use of noncomplying coatings (i.e., for VOC content) for rollcoaters #2 and #3 and for rollcoater #1. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southeast District Office within 30 days of occurrence.

4. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly controlled VOC emissions from the coatings and cleanup materials exceeded 1.47 lbs/hr, and the actual average hourly controlled VOC emissions for each such day.

5. The permittee shall submit annual reports which specify the total coatings usage in rollcoater #1 and the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year.

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

7. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #06-3776, issued on 10/27/93. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

Rollcoaters #2 and #3 and the edge coater shall employ coatings with a VOC content that does not exceed 0.5 pound per gallon of coating.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3. The permittee shall use formulation data or USEPA Method 24 to determine the VOC content of the coatings and cleanup materials.

1.b Emission Limitation:

Rollcoater #1 shall employ coatings with a VOC content that does not exceed 7.5 pounds per gallon of coating and 10,950 gallons per year (source maximum capacity).

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3. The permittee shall use formulation data or USEPA Method 24 to determine the VOC content of the coatings and cleanup materials.

V. Testing Requirements (continued)

1.c Emission Limitation:

VOC emissions shall not exceed 1.47 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Method 25, 25A, or 25B, and Method 204.

1.d Emission Limitation:

Ninety-five percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing methods and procedures specified in section A.V.2.

1.e Emission Limitation:

VOC emissions shall not exceed 6.45 tpy.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily VOC emissions from section A.III.3 for the calendar year and dividing by 2000 lbs/ton.

1.f Emission Limitation:

100% capture efficiency of the PTE

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing methods and procedures specified in section A.V.2.

V. Testing Requirements (continued)

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

a. The emission testing shall be conducted within 6 months after issuance of this permit and within 12 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the 100% capture efficiency, the ninety-five percent destruction efficiency for the RTO, and the allowable hourly emission rate.

c. The capture efficiency shall be determined using Methods 204 through 204F, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination of capture efficiency in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.

The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.

No later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office's refusal to accept the results of the emission test(s).

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

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

3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-3776, issued on 10/27/93. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Molding Finishing System (K003)

Activity Description: System for the finishing of cabinet molding components

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
molding finishing system vented to a regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) (PTI 06-4443 - synthetic minor to avoid PSD)	Volatile organic compound (VOC) emissions shall not exceed 8.42 lbs/hr. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(2)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-21-07(G)(6)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-31-05(D)	VOC emissions shall not exceed 26.26 tpy. See sections A.I.2.a, A.I.2.b, and A.I.2.c.

2. Additional Terms and Conditions

2.a The permittee shall operate this emissions unit no more than 6240 hrs/yr, as a rolling, 12-month summation.

2.b The permittee shall employ only coatings with VOC contents that do not exceed 7.51 pounds per gallon of coating.

2. Additional Terms and Conditions (continued)

2.c The VOC emissions from this emissions unit (from coatings and cleanup materials) shall be controlled through the application of a permanent total enclosure (PTE) with a 100% capture efficiency and a RTO system with a 95% removal/destruction efficiency. The PTE serving this emissions unit shall be maintained in such a manner as to meet the criteria established for a PTE in Method 204 (40 CFR Part 51, Appendix M) whenever the emissions unit is in operation, unless the permittee is successful in making the demonstration described below:

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

Such a successful demonstration was made after installation of this emissions unit. Since the PTE can not be compromised under normal plant conditions when the emissions unit is in operation, the permittee will not be required to comply with any differential pressure operational restrictions, monitoring, record keeping, and reporting requirements to ensure the ongoing integrity of the PTE.

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

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

2. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance, and the cause(s) and remedial action(s) taken; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation, and the cause(s) and remedial action(s) taken.

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

3. The permittee shall collect and record the following information for each day for the coating operation:

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

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

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

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

e. the total number of hours the emissions unit was in operation; and

f. the average hourly controlled VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

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

4. The permittee shall maintain a monthly record of the hours of operation for this emissions unit and the hours of operation as a rolling, 12-month summation.

5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #06-4443, issued on 8/9/95. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified above, and the cause(s) and remedial action(s) taken.

2. The permittee shall submit quarterly summaries which include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation in addition to the cause(s) and remedial action(s) taken. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

3. The permittee shall notify the Ohio EPA, Southeast District Office in writing of any daily record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southeast District Office within 30 days of occurrence.

4. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly controlled VOC emissions from the coatings and cleanup materials exceeded 8.42 lbs/hr, and the actual average hourly controlled VOC emissions for each such day.

5. The permittee shall submit quarterly deviation (excursion) reports that identify each month during which the operating hours for this emissions unit exceeded 6240 hours as a rolling, 12-month summation, and the actual operating hours for this emissions unit, as a rolling, 12-month summation, for each such month.

6. The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year.

This reporting requirement may be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.

IV. Reporting Requirements (continued)

7. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #06-4443, issued on 8/9/95. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

VOC emissions shall not exceed 8.42 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

If required, compliance shall be demonstrated based upon the emission testing methods and procedures specified in 40 CFR Part 60, Appendix A, Method 25, 25A or 25B.

1.b Emission Limitation:

The permittee shall employ coatings with a VOC content not to exceed 7.51 pounds per gallon of coating in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

1.c Emission Limitation:

The permittee shall operate this emissions unit no more than 6240 hrs/yr, as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

1.d Emission Limitation:

VOC emissions shall not exceed 26.26 tpy.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

1.e Formulation data or USEPA Method 24 shall be used to determine the VOC contents of the coatings and cleanup materials.

V. Testing Requirements (continued)

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

a. The emission testing shall be conducted within 6 months after issuance of this permit and within 12 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the ninety-five percent destruction efficiency requirements for the RTO.

c. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Southeast District Office.

d. The destruction efficiency (i.e., the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. The test methods and procedures selected shall be based on a consideration of the diversity of the organic species present and their total concentration, and on a consideration of the potential presence of interfering gases.

No later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office's refusal to accept the results of the emission test(s).

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

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

3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-4443, issued on 8/9/95. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Wood Working System (P005)

Activity Description: Planers, saws, molders, drilling machines used to machine wood into cabinet components

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
wood working system	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions shall not exceed 0.551 lb/hr (Table I).

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

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

2. Notwithstanding the frequency of reporting requirements specified in section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

a. for 1 full quarter the facility's visual observations indicate no visible emissions; and

b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section A.III.1.

The permittee shall revert to daily readings if any visible emissions are observed.

IV. Reporting Requirements

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

V. Testing Requirements

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

1.a Emission Limitation:

Particulate emissions from the stack shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the emission testing methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

1.b Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Lumber Planer (P007)

Activity Description: Planer for surfacing lumber to uniform thickness in preparation for drying

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
lumber planer controlled with a fabric filter	OAC rule 3745-31-05(A)(3) (PTI 06-1264)	Particulate emissions shall not exceed 1.2 lbs/hr. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

2. Notwithstanding the frequency of reporting requirements specified in section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

a. for 1 full quarter the facility's visual observations indicate no visible emissions; and

b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section A.III.1.

The permittee shall revert to daily readings if any visible emissions are observed.

3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #06-1264, issued on 11/28/84. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

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

2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #06-1264, issued on 11/28/84. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

V. Testing Requirements (continued)

1.b Emission Limitation:

Particulate emissions shall not exceed 1.2 lbs/hr.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon the emission testing methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-1264, issued on 11/28/84. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Fletcher #1 (P008)

Activity Description: Edgestain application and route underside

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
fletcher #1	OAC rule 3745-31-05(A)(3) (PTI 06-2707)	Volatile organic compound (VOC) emissions shall not exceed 6.5 lbs/hr, 130.0 lbs/day, and 19.2 tpy. Particulate emissions shall not exceed 2.4 tpy. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11, and 3745-21-07(G).
	OAC rule 3745-21-07(G)	See section A.I.2.a.
	OAC rule 3745-17-11	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-17-07(A)	Visible particulate emissions from this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

2. Additional Terms and Conditions

2.a The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records which include the following information for this emissions unit:

a. the company identification of each coating and cleanup material employed and documentation as to whether or not each coating and cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-05(C)(5);

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

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

d. the total daily VOC emissions, in lbs/day;

e. the total hours the emissions unit was in operation; and

f. the average hourly VOC emissions, in lbs/hr.

2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #06-2707, issued on 8/8/90. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material was employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly VOC emissions from this emissions unit exceeded 6.5 lbs/hr, and the actual average hourly VOC emissions for each such day.

3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions from this emissions unit exceeded 130.0 lbs/day, and the actual daily VOC emissions for each such day.

4. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year.

This reporting requirement may be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.

IV. Reporting Requirements (continued)

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

6. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #06-2707, issued on 8/8/90. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

1.b Emission Limitation:

VOC emissions shall not exceed 6.5 lbs/hr and 130.0 lbs/day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

1.c Emission Limitation:

VOC emissions shall not exceed 19.2 tpy.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily VOC emissions from section A.III.1 for the calendar year and dividing by 2000 lbs/ton.

1.d Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

V. Testing Requirements (continued)

1.e Emission Limitation:

Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

E = (M) * (1-TE) * (1-CE)

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

1.f Emission Limitation:

Particulate emissions shall not exceed 2.4 tpy.

Applicable Compliance Method:

The particulate emission limitation, in tpy, was determined by multiplying the allowable particulate emission limitation of 0.551 lb/hr by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. As long as compliance with the short term limit of 0.551 lb/hr is maintained, it will be assumed that compliance is also maintained with the tpy limit.

2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-2707, issued on 8/8/90. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Fletcher #2 (P009)

Activity Description: Edgestain application and route underside

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
fletcher #2	OAC rule 3745-31-05(A)(3) (PTI 06-2707)	Volatile organic compound (VOC) emissions shall not exceed 6.5 lbs/hr, 130.0 lbs/day, and 19.2 tpy. Particulate emissions shall not exceed 2.4 tpy. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11, and 3745-21-07(G).
	OAC rule 3745-21-07(G)	See section A.I.2.a.
	OAC rule 3745-17-11	Particulate emissions shall not exceed 0.551 lb/hr.
	OAC rule 3745-17-07(A)	Visible particulate emissions from this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

2. Additional Terms and Conditions

2.a The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records which include the following information for this emissions unit:

a. the company identification of each coating and cleanup material employed and documentation as to whether or not each coating and cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-05(C)(5);

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

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

d. the total daily VOC emissions, in lbs/day;

e. the total hours the emissions unit was in operation; and

f. the average hourly VOC emissions, in lbs/hr.

2. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

3. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #06-2707, issued on 8/8/90. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material was employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly VOC emissions from this emissions unit exceeded 6.5 lbs/hr, and the actual average hourly VOC emissions for each such day.

3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions from this emissions unit exceeded 130.0 lbs/day, and the actual daily VOC emissions for each such day.

4. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year.

This reporting requirement may be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.

IV. Reporting Requirements (continued)

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

6. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #06-2707, issued on 8/8/90. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

1.b Emission Limitation:

VOC emissions shall not exceed 6.5 lbs/hr and 130.0 lbs/day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

1.c Emission Limitation:

VOC emissions shall not exceed 19.2 tpy.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily VOC emissions from section A.III.1 for the calendar year and dividing by 2000 lbs/ton.

1.d Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

V. Testing Requirements (continued)

1.e Emission Limitation:

Particulate emissions shall not exceed 0.551 lb/hr.

Applicable Compliance Method:

To determine the actual worst case particulate emission rate, the following equation shall be used:

E = (M) * (1-TE) * (1-CE)

where:

E = particulate emission rate (lbs/hr)

M = maximum coating solids usage rate (lbs/hr)

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

CE = control efficiency of the control equipment - If more than one piece of control equipment is used in series, the equation should be multiplied by additional (1-CE) terms for each additional piece of equipment.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

1.f Emission Limitation:

Particulate emissions shall not exceed 2.4 tpy.

Applicable Compliance Method:

The particulate emission limitation, in tpy, was determined by multiplying the allowable particulate emission limitation of 0.551 lb/hr by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. As long as compliance with the short term limit of 0.551 lb/hr is maintained, it will be assumed that compliance is also maintained with the tpy limit.

2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-2707, issued on 8/8/90. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Spray Repair Booth (R001)

Activity Description: Touch up spray booth for repair of components

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
spray repair booth controlled with dry mesh filters	OAC rule 3745-31-05(A)(3) (PTI 06-07017)	Visible organic compound (VOC) emissions shall not exceed 8.0 lbs/hr, 128.0 lbs/day, and 16.1 tons per rolling, 12-month period. Particulate emissions shall not exceed 13.3 tpy. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-11, and 3745-21-07(G). See section A.I.2.a.
	OAC rule 3745-17-07(A)	Visible particulate emissions from this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11	Particulate emissions from this emissions unit shall not exceed 3.04 lbs/hr.
	OAC rule 3745-21-07(G)	See section A.I.2.a.
	40 CFR Part 63, Subpart JJ	See Part II, A.

2. Additional Terms and Conditions

2.a The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

II. Operational Restrictions

1. The permittee shall employ a spray booth filter having a design control efficiency for particulates greater than 99% during any operation of this emissions unit.

II. Operational Restrictions (continued)

2. The total maximum VOC emissions of emissions unit R001 shall not exceed 16.1 tons per rolling, 12-month period, based upon a rolling, 12-month summation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records which include the following information for this emissions unit:

a. the company identification of each coating and cleanup material employed and documentation as to whether or not each coating and cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-05(C)(5);

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

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

d. the total daily VOC emissions, in lbs/day;

e. the total hours the emissions unit was in operation; and

f. the average hourly VOC emissions, in lbs/hr.

2. The permittee shall maintain monthly records of the rolling, 12-month VOC emissions.

3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

4. Notwithstanding the frequency of reporting requirements specified in section A.IV, the permittee may reduce the frequency of visual observations for this emissions unit from daily to weekly readings if the following conditions are met:

a. for 1 full quarter the facility's visual observations indicate no visible emissions; and

b. the permittee continues to comply with all the record keeping and monitoring requirements specified in section A.III.3.

The permittee shall revert to daily readings if any visible emissions are observed.

5. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #06-07017, issued on 1/21/03. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material was employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.

2. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly VOC emissions from this emissions unit exceeded 8.0 lbs/hr, and the actual average hourly VOC emissions for each such day.

3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions from this emissions unit exceeded 128.0 lbs/day, and the actual daily VOC emissions for each such day.

4. The permittee shall submit quarterly deviation (excursion) reports that identify each 12-month period during which the rolling, 12-month total VOC emissions from this emissions unit exceeded 16.1 tons per rolling, 12-month period, and the actual rolling, 12-month total VOC emissions for each such period.

5. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year.

This reporting requirement may be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.

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

7. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #06-07017, issued on 1/21/03. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

1.b Emission Limitation:

VOC emissions shall not exceed 8.0 lbs/hr and 128.0 lbs/day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

V. Testing Requirements (continued)

1.c Emission Limitation:

VOC emissions shall not exceed 16.1 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1.

Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

1.d Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

1.e Emission limitation :

This emissions unit is limited to 3.04 pounds per hour of particulate matter emissions.

Applicable Compliance Method:

Compliance with the particulate matter emission limits may be demonstrated by multiplying the maximum usage rate, solids content (by weight), and coating density by the design control efficiency of the filters (99%) as follows:

(1.58 lb solids/gal)(162 gal/hr)(1 - 0.99) = 2.56 lbs PE/hr

(2.56 lbs PE/hr)(8760 hrs/yr)(0.0005 ton/lb) = 11.2 tons/yr

Note: Neither the hourly nor the annual PM emission limits would be exceeded if a spray booth filter having a design control efficiency for particulates greater than 99% is employed during operation of the emissions unit.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

1.f Emission Limitation:

Particulate emissions shall not exceed 13.3 tpy.

Applicable Compliance Method:

The particulate emission limitation, in tpy, was determined by multiplying the allowable particulate emission limitation of 3.04 lbs/hr by the maximum annual hours of operation (8760 hrs), and then dividing by 2000 lbs/ton. As long as compliance with the short term limit of 3.04 lbs/hr is maintained, it will be assumed that compliance is also maintained with the tpy limit.

V. Testing Requirements (continued)

2. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-07017, issued on 1/21/03. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Stain, Seal, & Topcoaters and Dryers (R007)

Activity Description: Surface coating of wood kitchen cabinet components

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
stain, seal & topcoaters and dryers vented to a regenerative thermal oxidizer (RTO)	OAC rule 3745-31-05(A)(3) (PTI 06-2707)	Volatile organic compound (VOC) emissions shall not exceed 55.37 lbs/hr, 1107.3 lbs/day, and 202.1 tpy. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-21-07(G)(6)(a).
	OAC rule 3745-21-07(G)(2)	The permittee shall not discharge more than 40 pounds of organic materials into the atmosphere in any one day, nor more than 8 pounds in any one hour, unless said discharge has been reduced by at least 85%. See section A.I.2.a.
	OAC rule 3745-21-07(G)(6)(a)	Emission of organic materials into the atmosphere from this emissions unit shall be reduced by incineration, provided that ninety percent or more of the carbon in the organic material being incinerated is oxidized to carbon dioxide.

2. Additional Terms and Conditions

2.a In order to maintain compliance with the hourly allowable VOC emission limitation (55.37 lbs/hr), the overall control efficiency of the RTO must be greater than 85%; therefore, no monitoring, record keeping, and reporting are required for the emission limitations specified in OAC rule 3745-21-07(G)(2).

II. Operational Restrictions

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

III. Monitoring and/or Record Keeping Requirements

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

2. The permittee shall collect and record the following information for each day:

a. all 3-hour blocks of time during which the average combustion temperature within the RTO, when the emissions unit was in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance and the cause(s) and remedial action(s) taken; and

b. a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation and the cause(s) and remedial action(s) taken.

3. The permittee shall collect and record the following information for each day for the coating operation:

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

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

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

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

e. the total number of hours the emissions unit was in operation; and

f. the average hourly controlled VOC emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

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

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #06-2707, issued on 8/8/90. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the RTO did not comply with the temperature limitation specified above and the cause(s) and remedial action(s) taken.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly summaries that include a log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation. These summaries shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

3. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the average hourly VOC emissions from this emissions unit exceeded 55.37 lbs/hr, and the actual average hourly VOC emissions for each such day.

4. The permittee shall submit quarterly deviation (excursion) reports that identify each day during which the VOC emissions from this emissions unit exceeded 1107.3 lbs/day, and the actual daily VOC emissions for each such day.

5. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year.

This reporting requirement may be satisfied by including and identifying the specific emission data and calculations for this emissions unit in the annual Fee Emission Report to be submitted by April 15 of each year.

6. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #06-2707, issued on 8/8/90. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

V. Testing Requirements

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

1.a Emission Limitation:

VOC emissions shall not exceed 55.37 lbs/hr and 1107.3 lbs/day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.3.

Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

1.b Emission Limitation:

VOC emissions shall not exceed 202.1 tpy.

Applicable Compliance Method:

Compliance shall be demonstrated by summing the daily VOC emissions from section A.III.3 for the calendar year and dividing by 2000 lbs/ton.

1.c Emission Limitation:

Emission of organic materials shall not exceed 8 lbs/hr and 40 lbs/day, unless emissions are reduced by 85%.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing methods and procedures specified in section A.V.2.

V. Testing Requirements (continued)

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

a. The emission testing shall be conducted within 6 months after issuance of this permit and within 12 months of expiration of this permit.

b. The emission testing shall be conducted to demonstrate compliance with the overall control efficiency limitation for organic compounds, the ninety percent destruction efficiency requirement for the thermal incinerator, and the allowable hourly emission rate.

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

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

e. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office.

No later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office's refusal to accept the results of the emission test(s).

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

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

3. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials.

4. Pursuant to OAC rule 3745-77-07(A)(3)(a)(ii), the above testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #06-2707, issued on 8/8/90. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

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

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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