

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

4/10/2014

Certified Mail

Jonas Miller
Trailway Wood II
3173 Twp Rd 414
Dundee, OH 44624

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0238000187
Permit Number: P0116444
Permit Type: Initial Installation
County: Holmes

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Holmes County Hub. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,


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

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NEDO



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Trailway Wood II is a wood furniture manufacturer and finisher. The facility currently has a 260 hp diesel engine (B001), an emergency generator (B003), and two wood furniture coating booths (R001 and R002). The facility plans to expand the current operation and proposed in this FEPTIO application to install a 607 hp natural gas-fired engine (B004), a woodworking shop with dust collecting system (P001), and two additional new coating booths (R003 and R004).

3. Facility Emissions and Attainment Status:

The facility is located in Dundee, Holmes County, an area designated as "attainment" for all criteria pollutants, such as ozone, sulfur dioxide, PM_{2.5}, carbon monoxide and lead. Trailway Wood II will not be a "Major Source" for any single hazardous air pollutant (HAP) and combined total HAPs, based upon the facility-wide restrictions, and VOC emissions, based upon restrictions for emissions units R001, R002, R003, and R004, combined. Therefore, the requirements of Title V and Wood Furniture MACT, 40 CFR Part 63, subpart JJ, will not be applicable.

4. Source Emissions:

This FEPTIO proposes to restrict VOC emissions from all coating operations in the facility (emissions units R001, R002, R003, and R004, combined) not to exceed 24.9 tons per rolling, 12-month period, and facility-wide emissions of each single HAP and combined total HAPs not to exceed 9.0 tons per rolling, 12-month period and 24.0 tons per rolling 12-month period, respectively. In addition, Trailway Wood II is also required to track emissions, keep records, and submit reports.

5. Conclusion:

The emission limitations contained in this FEPTIO are adequate to provide federally enforceable limitations to ensure that the applicable MACT and Title V thresholds will not be exceeded.

6. Please provide additional notes or comments as necessary:

By limiting VOC emissions not to exceed 24.9 tons per rolling, 12-month period, the facility will also avoid being subject to the requirements of the Wood Furniture best available technology (BAT) found in OAC 3745-21-15.



7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC _{R001-R004}	24.9
HAP _{facility-wide}	9.0
HAPs _{facility-wide}	24.0

PUBLIC NOTICE
4/10/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

Trailway Wood II
2261 County Rd 168,
Dundee, OH 44624
Holmes County
FACILITY DESC.: Nonupholstered Wood Household Furniture Manufacturing
PERMIT #: P0116444
PERMIT TYPE: Initial Installation

PERMIT DESC: FEPTIO for initial installation of a natural gas-fired engine (B004), a woodworking operation system with a 14,500 cfm baghouse (P001), and two spray coating booths for wood furniture (R003 and R004).

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Tracy Gu, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Trailway Wood II**

Facility ID:	0238000187
Permit Number:	P0116444
Permit Type:	Initial Installation
Issued:	4/10/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Trailway Wood II

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Draft Permit-to-Install and Operate

Trailway Wood II

Permit Number: P0116444

Facility ID: 0238000187

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0238000187
Application Number(s): A0050255
Permit Number: P0116444
Permit Description: FEPTIO for initial installation of a natural gas-fired engine (B004), a woodworking operation system with a 14,500 cfm baghouse (P001), and two spray coating booths for wood furniture (R003 and R004).
Permit Type: Initial Installation
Permit Fee: \$625.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 4/10/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Trailway Wood II
2261 County Rd 168
Dundee, OH 44624

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Authorization (continued)

Permit Number: P0116444

Permit Description: FEPTIO for initial installation of a natural gas-fired engine (B004), a woodworking operation system with a 14,500 cfm baghouse (P001), and two spray coating booths for wood furniture (R003 and R004).

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

Emissions Unit ID:	B004
Company Equipment ID:	Natural Gas Engine #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Emissions Unit ID:	P001
Company Equipment ID:	woodworking system
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Spray Coating Operations

Emissions Unit ID:	R003
Company Equipment ID:	stain booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R004
Company Equipment ID:	topcoat booth
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate

Trailway Wood II

Permit Number: P0116444

Facility ID: 0238000187

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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



Draft Permit-to-Install and Operate

Trailway Wood II

Permit Number: P0116444

Facility ID: 0238000187

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) B.2.a)(2), B.2.b)(4), B.4.c), B.4.d), B.4.e), B.4.f), B.4.g), B.5.b), and B.6.a)(4).
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) B.2.a)(1), B.2.b)(1), B.2.b)(2), B.2.b)(3), B.3.a), B.4.a)(5), B.4.b)(2), B.4.b)(4), B.5.a), B.6.a)(1), B.6.a)(2), and B.6.a)(3).

2. **Applicable Emissions Limitations and/or Control Requirements**

- a) Facility-wide emissions shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
(1)	OAC rule 3745-31-05 (D) (Synthetic Minor to Avoid Title V and MACT)	See sections B.2.b)(1), B.2.b)(2), and B.2.b)(3).
(2)	ORC 3704.03 (F)(4)(c) and OAC rule 3745-114	See sections B.2.b)(4), B.4.c), B.4.d), B.4.e), B.4.f), B.4.g), B.5.b), and B.6.a)(4).

b) **Additional Terms and Conditions**

- (1) Facility-wide emissions of each single hazardous air pollutant (HAP) shall not exceed 9.0 tons per year, based upon a rolling, 12-month summation of monthly emissions.
- (2) Facility-wide emissions of combined total HAPs shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of monthly emissions.
- (3) Volatile organic compound (VOC) emissions from all the coatings and cleanup materials for emissions units R001, R002, R003, and R004, combined, shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions.
- (4) In order to demonstrate compliance with the "Toxic Air Contaminant Statute", the Director has established, per ORC 3704.03(F)(4)(c), a limit for operating hours, which shall not exceed 105 hours of coating time per week for each of emissions units R001, R002, R003, and R004. This operating hour restriction was calculated to ensure the ground level concentration (determined by the emission rate modeled) not to exceed the Maximum Acceptable Ground-Level Concentration (MAGLC).



3. Operational Restrictions

- a) To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the following emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Emissions of VOC from Emissions Units R001, R002, R003, and R004, combined (tons)	Maximum Allowable Cumulative Emissions of Each Individual HAP Facility-wide (tons)	Maximum Allowable Cumulative Emissions of Total Combined HAPs Facility-wide (tons)
1	3.0	1.0	2.0
1-2	6.0	2.0	4.0
1-3	9.0	3.0	6.0
1-4	12.0	4.0	8.0
1-5	15.0	5.0	10.0
1-6	18.0	6.0	12.0
1-7	21.0	7.0	14.0
1-8	24.0	8.0	16.0
1-9	24.9	9.0	18.0
1-10	24.9	9.0	20.0
1-11	24.9	9.0	22.0
1-12	24.9	9.0	24.0

After the first 12 calendar months of following the issuance of this permit, compliance with the annual emission limitations for VOC, each individual HAP, and total combined HAPs shall be based upon a rolling, 12-month summation of the emissions of VOC, each single HAP, and combined total HAPs.

4. Monitoring and/or Recordkeeping Requirements

- a) The permittee shall calculate and record the following information each month for emissions units R001, R002, R003, and R004, combined:
- (1) The company identification for each coating and cleanup material employed;



- (2) The number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;
- (3) The VOC content of each coating and cleanup material, as applied, in pounds per gallon;
- (4) The total monthly VOC emissions, in tons, from emissions units R001, R002, R003, and R004, combined;
- (5) The rolling, 12-month summation of the VOC emissions, in tons from emissions units R001, R002, R003, and R004, combined;
- (6) The actual single HAP¹ content and the combined HAPs content, in pounds per gallon, for each coating and cleanup material;
- (7) The rolling, 12-month summation of each single HAP emissions, in tons from emissions units R001, R002, R003, and R004, combined; and
- (8) The rolling, 12-month summation of the combined total HAPs emissions, in tons from emissions units R001, R002, R003, and R004, combined.

¹ A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials.

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

- b) The permittee shall calculate and record the following information each month facility-wide:
 - (1) The total monthly emissions of each single HAP, in tons;
 - (2) The rolling, 12-month summation of each single HAP emissions, in tons;
 - (3) The total monthly emissions of combined total HAPs, in tons; and
 - (4) The rolling, 12-month summation of the combined total HAPs emissions, in tons.
- c) The permittee shall keep an operating hours log each week for each of emissions units R001, R002, R003, and R004.
- d) The federally enforceable permit-to-install and operate (FEPTIO) application for these emissions unit(s), R001, R002, R003, and R004, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration



(MAGLC), calculated as described in the Ohio EPA guidance document entitled “Review of New Sources of Air Toxic Emissions, Option A”, as follows:

- (1) the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - a. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists’ (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; or
 - b. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists’ (ACGIH) “Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- (2) The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- (3) This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

The following summarizes the results of dispersion modeling for the significant toxic contaminants or “worst case” toxic contaminant(s):

- a. Compound: Toluene

TLV (mg/m3): 75.36196

Maximum Hourly Emission Rate (lbs/hr): 3.2295

Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 2,806.85

MAGLC (ug/m3): 2,870.93

- b. Compound: Xylene

TLV (mg/m3): 434,192.23



Maximum Hourly Emission Rate (lbs/hr): 2.375

Predicted 1-Hour Maximum Ground Level Concentration (ug/m3): 2,064.18

MAGLC (ug/m3): 16,540.66

The permittee, having demonstrated that emissions of xylene and toluene, from emissions units R001, R002, R003, and R004, combined, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions units at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- e) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour "maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- (1) changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - (2) changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - (3) physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- f) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):



- (1) a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
- (2) the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
- (3) a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
- (4) the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

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

5. Reporting Requirements

- a) The permittee shall submit quarterly deviation (excursion) reports that identify:
- (1) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - a. 24.9 tons of VOC emissions per rolling, 12-month period from all the coatings and cleanup materials for emissions units R001, R002, R003, and R004, combined.
 - b. Facility-wide emissions shall not exceed:
 - i. 9.0 tons per year of each single HAP, based upon a rolling, 12-month summation of monthly emissions: and
 - ii. 24.0 tons per year of combined total HAPs, based upon a rolling, 12-month summation of monthly emissions.
 - (2) the probable cause of each deviation (excursion);
 - (3) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and



- (4) the magnitude and duration of each deviation (excursion).

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

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

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

6. Testing Requirements

- a) Compliance with the Emissions Limitations and/or Control Requirements specified in sections B.2.a) and B.2.b) of these terms and conditions shall be determined in accordance with the following methods:

- (1) Emission Limitation:

24.9 tons of VOC emissions per rolling, 12-month period from all the coatings and cleanup materials for emissions units R001, R002, R003, and R004, combined.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in B.4.a)(5).

- (2) Emission Limitation:

Facility-wide emissions of each single hazardous air pollutant (HAP) shall not exceed 9.0 tons per year, based upon a rolling, 12-month summation of monthly emissions.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in B.4.b)(2).

- (3) Emission Limitation

Facility-wide emissions of combined total HAPs shall not exceed 24.0 tons per year, based upon a rolling, 12-month summation of monthly emissions.

Applicable Compliance Method:

Compliance shall be determined based upon the record keeping requirements specified in B.4.b)(4).



(4) Operational Restriction:

105 hours of coating time per week for each emissions unit of R001, R002, R003, and R004.

Applicable Compliance Method:

Compliance with shall be determined based upon the record keeping requirements specified in B.4.c).

7. Miscellaneous Requirements

- a) The facility's PTE is below the 40 CFR Part 63, Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, thresholds of 10 tons per year for any single HAP and 25 tons per year for combined total HAPs. If the rolling, 12-month emissions for each single or total combined HAPs exceed the 10 tons per year or 25 tons per year limits, this facility will be subject to Subpart JJ and will be required to comply with the major source requirements outlined in the subpart within 365 days after exceeding the limits.



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Trailway Wood II

Permit Number: P0116444

Facility ID: 0238000187

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. B004, Natural Gas Engine #1

Operations, Property and/or Equipment Description:

4SLB Stationary spark ignition (SI), internal combustion engine (ICE) 607 hp (greater than or equal to 500 hp and less than 1,350hp), manufactured in 2013 (on or after 7/1/10), burning natural gas only. Natural Gas Engine #1

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

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

a. None.

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

a. b)(1)g.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)(5)(b)	Particulate emissions (PE) shall not exceed 0.062 lb/MMBtu of actual heat input from ICE greater than 600 HP.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
c.	OAC rule 3745-18-06(G)	Pursuant to OAC rule 3745-18-06(A), this stationary internal combustion engine is exempt from the sulfur dioxide (SO ₂) emission limitation specified by this rule during any calendar day in which natural gas is the only fuel burned.
d.	OAC rule 3745-31-05 (A)(3) As effective 11/30/2001	The requirements established pursuant to this rule are equivalent to the requirements established pursuant to 40 CFR Part 63,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Subpart ZZZZ for nitrogen oxides (NO _x), and volatile organic compounds (VOC) emissions. See b)(2)a.
e.	OAC rule 3745-31-05 (A)(3) As effective 12/1/2006	See b)(2)b and b)(2)c.
f.	ORC 3704.03 (T)	The requirements established pursuant to this rule are equivalent to the requirements established pursuant to 40 CFR Part 63, Subpart ZZZZ for carbon monoxide (CO) emissions.
g.	OAC rule 3745-31-05 (D)	See B.2.(b)(1) and B.2.b)(2).
h.	40 CFR Part 60, Subpart JJJJ In accordance with 40 CFR 60.4230, this emissions unit is subject to the New Source Performance Standards (NSPS) for Stationary Spark Ignition (SI) Internal Combustion Engines (ICE). 40 CFR §60.4233(e) 40 CFR §60.4231(e)-mfg. Table 1 to Part 60, Subpart JJJJ	The exhaust emissions from this engine shall not exceed: 1.0 gram of nitrogen oxides per horsepower hour (1.0 g NO _x /HP-hr) or 82 ppmvd at 15% O ₂ . 2.0 grams of carbon monoxide per horsepower hour (2.0 g CO/HP-hr) or 270 ppmvd at 15% O ₂ . 0.7 gram of volatile organic compounds per horsepower hour (0.7 g VOC/HP-hr) or 60 ppmvd at 15% O ₂ .
i.	40 CFR Part 63, Subpart ZZZZ 40 CFR §63.6590(c)(1)	A new stationary RICE located at an area source operating in compliance with Part 60 Subpart JJJJ is the demonstration of compliance for 40 CFR 63 Subpart ZZZZ.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA



approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply: b)(1)d and b)(2)a.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
- c. The BAT requirements under OAC rule 3745-31-05 (A)(3) do not apply to the emissions of NO_x and VOC from this air contaminant source since the uncontrolled potential to emit for the emissions of NO_x and VOC is less than 10 tons per year.
- d. The stationary spark ignition (SI) internal combustion engine (ICE) is subject to and shall be operated in compliance with the requirements of 40 CFR Part 60, Subpart JJJJ, the standards of performance for stationary SI ICE.
- e. The stationary SI ICE has been or shall be purchased certified by the manufacturer to emission standards as stringent as those identified in 40 CFR 60.4233(e) and found in Table 1 of Part 60, Subpart JJJJ for lean burn, natural gas engines greater than or equal to 500 HP and less than 1,350 HP and manufactured on or after 7/1/10.

c) Operational Restrictions

- (1) The stationary SI ICE shall be installed, operated, and maintained according to the manufacturer's specifications, written instructions, and procedures over the entire life of the engine. The permittee shall operate and maintain the stationary SI ICE to achieve the emission standards identified in 40 CFR 60.4233(e) and found in Table 1 of NSPS Subpart JJJJ over the entire life of the engine. The air-to-fuel ratio controllers shall be set by the manufacturer and/or according to the operations manual, to ensure proper operation of the engine and control device and to minimize emissions.
- (2) During emergency conditions the permittee may operate this engine using propane for a maximum of 100 hours per year as an alternative fuel and if records are maintained for such use. If the engine is not certified to burn propane the permittee shall conduct a performance test to demonstrate compliance with the emission standards in 40 CFR 60.4233.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the manufacturer's certification on site or at a central location for all facility ICE and it shall be made available for review upon request. If the manufacturer's certification is not kept on site, the permittee shall maintain a log for the location of each ICE and it shall identify the agency-assigned emissions unit number, the manufacturer's identification number, and the identification number of the certificate. The manufacturer's operations manual shall be maintained at the same location as the ICE.
- (2) The permittee shall maintain the following records and make them available upon request:



- a. all notifications submitted to comply with and all documentation supporting compliance with Part 60 Subpart JJJJ;
- b. records of all maintenance conducted on the engine;
- c. the certification from the manufacturer, documenting that the engine is certified to meet the emission standards identified in 40 CFR 60.4231(e); and
- d. the information identified in 40 CFR parts 90, 1048, 1054, and/or 1060 that is required to be provided by the manufacturer to the operator/owner, as applicable to the model year and horsepower of the engine.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) If the natural gas engine was purchased without an EPA certificate of conformity, the engine will need to meet the performance testing requirements of 40 CFR 60.4243(b)(2)(ii) and the permittee will be required to conduct an initial performance test and subsequent performance tests every 8,760 hours of operation or 3 years whichever comes first, to demonstrate compliance with the emission limits from Part 60 Subpart JJJJ.
- (2) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Opacity Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A.

b. Emission Limitations:

0.062 lb PE/MMBtu from ICE greater than 600 HP

Applicable Compliance Method:

The particulate emission limitation is from OAC rule 3745-17-11(B)(5) for stationary internal combustion engines.



If required, the permittee shall demonstrate compliance with the emission limitations through exhaust emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitations:

1.0 gram NO_x /HP-hr or 82 ppmvd at 15% O₂

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the manufacturer's certification to the emission standards identified in 40 CFR 60.4231(e) and by maintaining the engine according to the manufacturer's specifications. The g/HP-hr limit is the emission limitation from Table 1 to Part 60 Subpart JJJJ, the exhaust emission standards for lean burn, natural gas engines greater than or equal to 500 HP and less than 1,350 HP, manufactured on/after 7/1/10.

Where there is no certificate of conformity, the permittee shall demonstrate compliance with the NO_x limitation according the requirements of 40 CFR 60.4244, using the applicable test methods in Table 2 to Part 60 Subpart JJJJ.

d. Emission Limitations:

2.0 grams CO/HP-hr or 270 ppmvd at 15% O₂

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the manufacturer's certification to the emission standards identified in 40 CFR 60.4231(e) and by maintaining the engine according to the manufacturer's specifications. The g/HP-hr limit is the emission limitation from Table 1 to Part 60 Subpart JJJJ, the exhaust emission standards for lean burn, natural gas engines greater than or equal to 500 HP and less than 1,350 HP, manufactured on/after 7/1/10.

Where there is no certificate of conformity, the permittee shall demonstrate compliance with the CO limitation according the requirements of 40 CFR 60.4244, using the applicable test methods in Table 2 to Part 60 Subpart JJJJ.

e. Emission Limitations:

0.7 gram VOC/HP-hr or 60 ppmvd at 15% O₂

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the manufacturer's certification to the emission standards identified in 40 CFR 60.4231(e) and by maintaining the engine according to the manufacturer's specifications. The g/HP-hr limit is the emission limitation from Table 1 to Part 60 Subpart JJJJ, the exhaust emission standards for lean burn, natural gas engines greater than or equal to 500 HP and less than 1,350 HP, manufactured on/after 7/1/10.



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Where there is no certificate of conformity, the permittee shall demonstrate compliance with the VOC limitation according the requirements of 40 CFR 60.4244, using the applicable test methods in Table 2 to Part 60 Subpart JJJJ.

g) Miscellaneous Requirements

- (1) None.



2. P001, woodworking system

Operations, Property and/or Equipment Description:

A woodworking shop with a 14,500 cfmbaghouse control

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC 3745-17-07 (A)	Exempt. See b)(2)a.
b.	OAC 3745-17-07 (B)(1)	Exempt. See b)(2)b.
c.	OAC 3745-17-08 (B)	Exempt. See b)(2)c.
d.	OAC 3745-17-11	See b)(2)d and b)(2)e.
e.	OAC rule 3745-31-05 (A)(3) As effective 11/30/2001	See b)(2)f and b)(2)g.
f.	OAC rule 3745-31-05 (A)(3) As effective 12/1/2006	See b)(2)h and b)(2)i.
g.	OAC rule 3745-31-05 (E)	See b)(2)g.

(2) Additional Terms and Conditions

a. In accordance with OAC rule 3745-17-07 (A)(3)(h), this emissions unit is exempt from the visible particulate emission limitation.

b. In accordance with OAC rule 3745-17-07 (B)(11)(d), OAC rule 3745-17-07 (B)(1) shall not apply to any fugitive emissions units which are exempted from the requirements of OAC rule 3745-17-08 (B).



- c. The facility is not located at an Appendix A area of OAC rule 3745-17-08. In accordance with OAC rule 3745-17-08 (A)(1), these emissions units are exempt from the requirements of OAC rule 3745-17-08 (B).
 - d. The uncontrolled emission rate for these emissions units are not able to be ascertained, and therefore, in accordance with OAC rule 3745-17-11 (A)(2)(a), Figure II of OAC rule 3745-17-11 is not applicable to these emissions units.
 - e. The facility is located in Holmes County. It is exempt from Table I requirements, per OAC rule 3745-17-11 (A)(2)(b)
 - f. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply: b)(1)e, b)(2)f, and b)(2)g.
 - g. Particulate emissions (PE) from the emission units that vent to the baghouse shall not exceed 0.01 grain per dry standard cubic foot (grain/dscf).
 - h. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
 - i. The BAT requirements under OAC rule 3745-31-05 (A)(3) do not apply to the particulate emissions from this emissions unit since the "controlled" potential to emit for the particulate emissions is less than 10 tons per year.
- c) **Operational Restrictions**
- (1) Particulate emissions from this emissions unit shall be vented to the baghouse at all times when the emissions unit is in operation.
 - (2) The wood waste from the baghouse, per the permit application, will be collected in a storage silo, which is controlled by a cyclone, and then is unloaded into mobile trailers. The permittee has voluntarily agreed to utilize a telescoping tube to reduce load-out (drop height) emissions.
- d) **Monitoring and/or Recordkeeping Requirements**
- (1) In order to maintain compliance with the applicable emission limitation contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.125 to 6.0 inches of water.



- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a weekly basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

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

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

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

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during



future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit. In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

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

a. Emission Limitations

Particulate emissions (PE) from the emission units that vent to the baghouse shall not exceed 0.01 grain per dry standard cubic foot (grain/dscf).

Applicable Compliance Methods

If required, compliance shall be demonstrated in accordance with OAC 3745-17-03 (B)(10), U.S. EPA Method 5 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.



3. Emissions Unit Group -Spray Coating Operations: R003,R004,

EU ID	Operations, Property and/or Equipment Description
R003	Stain Booth for wood furniture finishing with over spray filters. Parts are air dried.
R004	Topcoat Booth for wood furniture finishing with over spray filters. Parts are air dried.

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

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

a. b)(1)g.

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

a. b)(1)c.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(C)	See c)(1), c)(2), d)(1), d)(2), d)(3), d)(4) and d)(5).
b.	OAC rule 3745-21-07(M)(2)	See b)(2)a.
c.	OAC rule 3745-31-05(D)	See B.2.a)(1).
d.	ORC 3704.03(T)	The emission limitations established pursuant to this rule are equivalent to the emission limitations established pursuant to OAC rule 3745-31-05(D) for VOC emissions.
e.	OAC rule 3745-31-05(A)(3) as effective 11/30/2001	The emission limitation established pursuant to this rule is equivalent to the requirements established pursuant to OAC rule 3745-17-11(C) for particulate emissions (PE). See b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-31-05(A)(3)(b) as effective 12/01/2006	See b)(2)c.
g.	ORC 3704.03(F)(4)(c) and OAC rule 3745-114-01	See B.2.a)(2).

(2) Additional Terms and Conditions

- a. In accordance with OAC rule 3745-21-07(M)(3)(a), OAC rule 3745-21-07(M)(2) is not applicable because these emissions units are not equipped with control devices for OC emissions.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC Rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP) Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply: b)(1)f and b)(2)b.
- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE from this air contaminant source since the calculated annual emission rate for PE is less than 10 tons per year taking into account the federally enforceable work practice requirements in OAC rule 3745-17-11(C).

c) Operational Restrictions

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



d) Monitoring and/or Recordkeeping Requirements

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

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

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.



Draft Permit-to-Install and Operate

Trailway Wood II

Permit Number: P0116444

Facility ID: 0238000187

Effective Date: To be entered upon final issuance

f) Testing Requirements

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

a. None.

g) Miscellaneous Requirements

(1) None.