



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
CUYAHOGA COUNTY**

CERTIFIED MAIL

Application No: 13-04128

DATE: 12/9/2003

Nagele Manufacturing Company
Ronald Nagele
5201 West 164th Street
Brook Park, OH 44142

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

CLAA

PA

CUYAHOGA COUNTY

**PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 13-04128 FOR AN AIR CONTAMINANT SOURCE FOR
NAGELE MANUFACTURING COMPANY**

On 12/9/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Nagele Manufacturing Company**, located at **5201 West 164th Street, Brook Park**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 13-04128:

Wood working cutting machines -- P001; and Binks spray booth, drying and primer station -- K001.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

David Hearne, Cleveland City Health Department, Division of the Environment, 1925 St. Clair Avenue, Cleveland, OH 44114 [(216)664-2324]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 13-04128

Application Number: 13-04128
APS Premise Number: 1318128365
Permit Fee: **To be entered upon final issuance**
Name of Facility: Nagele Manufacturing Company
Person to Contact: Ronald Nagele
Address: 5201 West 164th Street
Brook Park, OH 44142

Location of proposed air contaminant source(s) [emissions unit(s)]:
**5201 West 164th Street
Brook Park, Ohio**

Description of proposed emissions unit(s):
Wood working cutting machines -- P001; and Binks spray booth, drying and primer station -- K001.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. 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.

4. 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

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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.

5. 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).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may

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lead to such sanctions

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and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

Emissions Unit ID: **K001**

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. 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. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	2.53
PE/PE ₁₀	4.12

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
K001 - binks spray booth; coating wood parts	OAC rule 3745-31-05(A)(3)	6.94 lbs VOC/hour and 13.88 lbs VOC/day and 2.53 tons VOC/year
	OAC rule 3745-21-07(G)(2)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR 63 Subpart JJ	See A.2.a.

2. Additional Terms and Conditions.

2.a The permittee shall meet the following of 40 CFR part 63 Subpart JJ:

- i. use less than 5 tons per each rolling 12-month period of each hazardous air pollutant (HAP) at the facility, including materials used for source categories other than wood furniture; and
- ii. use less than 12.5 tons per each rolling 12-month period of the combination of all HAPs at the facility, including material used for source categories other than wood furniture.
- iii. ensure that at least 90 percent of the plantwide HAP emissions per each rolling 12-month period is associated with the manufacture of wood furniture or wood furniture components.

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Emissions Unit ID: K001

The permittee shall include any HAP emissions generated by all other emissions units at the facility in determining compliance with the above-mentioned limitations.

B. Operational Restrictions

1. The permittee shall utilize a dry filter at all times the emissions unit is in operation.

C. Monitoring and/or Record keeping Requirements

- i. The permittee shall collect and record the following information for each day for the coating operation:
 - a. the company identification for each coating;
 - b. the number of gallons of each coating;
 - c. the OC content of each coating, in lbs/gallon of OC;
 - d. the total emission rate for all coatings, in lbs/day of OC (summation of b x c for all coatings employed);

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

2. The permittee shall collect and record the following information each month for all emissions units:
 - a. an identification of each coating;
 - b. the number of gallons of each coating;
 - c. the single HAP content of each coating, in lbs/gallon;
 - d. the combined HAPs content of each coating, in lbs/gallon;
 - e. the emissions of each single HAP from each coating, in lbs;
 - f. the total emissions of each single HAP from all coatings, in lbs;
 - g. the emissions of combined HAPs from each coating, in lbs; and
 - h. the total emissions of combined HAPs from all coatings, in lbs.

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3. The permittee shall collect and record the following information each month for all emissions units:
 - a. the rolling 12-month emissions of each single HAP; and
 - b. the rolling 12-month emissions of the combined HAPs.

D. Reporting Requirements

1. The permittee shall notify the Cleveland Division of Air Quality (CDAQ) in writing for the identification of each rolling 12-month period during which any single HAP emissions from all emissions units exceeded 5 tons, and the actual single HAP emissions for each such rolling 12-month period. The report shall be submitted within 30 days after the exceedance occurs.
2. The permittee shall notify CDAQ in writing for the identification of each rolling 12-month period during which any combined HAP emissions from all emissions units exceeded 12.5 tons, and the actual combined HAP emissions for each such rolling 12-month period. The report shall be submitted within 30 days after the exceedance occurs.
3. The permittee shall submit annual written reports to CDAQ which summarize the total emissions of each single HAP and of all combined HAPs for all emissions units for the previous calendar year. The reports shall include the emissions calculations and shall be submitted by January 31 of each year.
4. The permittee shall submit quarterly written deviation (excursion) reports to CDAQ which identify days when the emissions unit exceeded the lbs VOC/day allowable limit. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
6.94 lbs/hour of VOC emissions.

Applicable Compliance Method:
Compliance with the hourly emission limitation shall be determined by this one time calculation for the potential to emit:

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Emissions Unit ID: **K001**

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$$(5.55 \text{ lbs VOC/gal})(2.5 \text{ gal/day})(1 \text{ day}/2 \text{ hours}) = 6.94 \text{ lbs VOC/hour}$$

- b. Emission Limitation:
13.88 lbs/day of VOC emissions.

Applicable Compliance Method:

Compliance with the daily emission limitation shall be determined based upon the record keeping requirements specified in Section C.1.

- c. Emission Limitation:
2.53 tons/yr of VOC emissions.

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PTI A

Emissions Unit ID: **K001**

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Applicable Compliance Method:

The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.

- d. Emission Limitation:
Less than 5 tons per each rolling 12-month period for each HAP at the facility.

Applicable Compliance Method:

Compliance with the above limit shall be determined based upon the record keeping requirements specified in Section C.2 and C.3.

- e. Emission Limitation:
Less than 12.5 tons per each rolling 12-month period of combined HAPs at the facility.

Applicable Compliance Method:

Compliance with above limit shall be determined based upon the record keeping requirements specified in Section C.2 and C.3.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - pneumatic (11,000 acfm) wood waste handling system for cutting, sawing, and shaping of wood parts	OAC rule 3745-31-05 (A)(3)	0.01 gr/dscf, 0.94 lbs PE/PE ₁₀ /hour, and 4.12 tons PM/PE ₁₀ per year
	OAC rule 3745-17-07(A)	Opacity restriction (see A.2.a)
	OAC rule 3745-17-11	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
		The particulate emission limitation specified by this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**

- 2.a Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

B. Operational Restrictions

None.

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Emissions Unit ID: **P001**

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C. Monitoring and/or Recordkeeping 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 baghouse serving this

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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 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.

D. Reporting Requirements

1. The permittee shall submit the deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland Division of Air Quality (CDAQ) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emissions Limitation: 0.01 gr/dscf and 0.94 lb PE/PE₁₀ hr

Applicable Compliance Method: Compliance with the lbs/hr limit may be determined by multiplying the maximum outlet concentration of 0.01 gr/dscf by the maximum volumetric air flow (11,000 acfm), and the appropriate conversion factors of 1 dscf/1 acf, 60 minutes/hr, and divide by 7000 grains/lb. PE is assumed to be equivalent to PE₁₀. If required, compliance shall be determined by performing a stack test using Methods 1 - 5 of 40 CFR Part 60, Appendix A.

- b. Emissions Limitation: 4.12 TPY PE/PM₁₀

Applicable Compliance Method: The annual emission limitation was established by multiplying the hourly emission rate by 8760 hours of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

- c. Emissions Limitation: Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method: If required, visible emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

None