



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
BUTLER COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 14-05896

Fac ID: 1409031000

DATE: 5/15/2007

Custom Millcraft Corporation
Bart Miller
9092 LeSaint Drive
Fairfield, OH 45014-2241

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 5/15/2007
Effective Date: 5/15/2007**

FINAL PERMIT TO INSTALL 14-05896

Application Number: 14-05896
Facility ID: 1409031000
Permit Fee: **\$1200**
Name of Facility: Custom Millcraft Corporation
Person to Contact: Bart Miller
Address: 9092 LeSaint Drive
Fairfield, OH 45014-2241

Location of proposed air contaminant source(s) [emissions unit(s)]:

**9092 LeSaint Drive
Fairfield, Ohio**

Description of proposed emissions unit(s):

New PTI application for already installed sources: a lacquer coating spray booth, an adhesive spray booth, and woodworking equipment.

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

Chris Korleski
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 (i.e., postmarked) quarterly 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

Custom Millcraft Corporation
PTI Application: 14-05896
Issued: 5/15/2007

Facility ID: 1409031000

the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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)

Custom Millcraft Corporation
PTI Application: 14-05896
Issued: 5/15/2007

Facility ID: 1409031000

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 lead to such sanctions 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.

Custom Millcraft Corporation
 PTI Application: 14-05896
 Issued: 5/15/2007

Facility ID: 1409031000

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(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> |
|------------------|----------------------|
| VOC | 24.9 |
| PE/PM10 | 0.75 |

Emissions Unit ID: P001

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.

Operations, Property, and/or Equipment - (P001) - Woodworking Operations

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|-------------------------------|--|
| OAC rule 3745-31-05(A)(3) | <p>Particulate emissions (PE) shall not exceed 0.17 pound per hour (lb/hr). PE shall not exceed 0.75 ton per year (TPY).</p> <p>Particulate matter 10 microns and less in diameter (PM10) emissions shall not exceed 0.17 lb/hr. PM10 emissions shall not exceed 0.75 TPY.</p> <p>The hourly and annual emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly and annual records are required to demonstrate compliance with these limitations.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A).</p> |
| OAC rule 3745-17-07(A) | See term A.2.a. |
| OAC rule 3745-17-07(B) | Exempt per OAC rule 3745-17-07(B)(11)(e). |
| OAC rule 3745-17-11 | The emissions limitation established by OAC rule 3745-17-11 is less stringent than OAC rule 3745-31-05(A)(3). |

2. Additional Terms and Conditions

- 2.a Visible particulate emissions from the stack for emissions unit P001 shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a baghouse and compliance with the emissions limitations.

Issued: 5/15/2007

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

None

D. Reporting Requirements

None

E. Testing Requirements

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

Emission Limitation:

PE/PM10 emissions shall not exceed 0.17 lb/hr and 0.75 TPY.

Applicable Compliance Method:

Amount of sawdust collected (in cubic yards) multiplied by 300 lbs/yd³ divided by 99% (the control efficiency of the baghouse) = Amount of sawdust produced.

Amount of sawdust produced multiplied by one minus 99% = Amount of particulate (sawdust) emitted.

If required, compliance with the hourly PE limitation shall be demonstrated through an emissions source test performed in accordance with the requirements of 40 CFR Part 60, Appendix A, Methods 1 - 5.

Emission Limitation:

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

Applicable Compliance Method:

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

Custom Millcraft Corporation
DTI Application: 11-05906

Facility ID: 1409031000

Emissions Unit ID: **P001**

F. Miscellaneous Requirements

None

Issued: 5/15/2007

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.

Operations, Property, and/or Equipment - (R001) - Lacquer Coating Spray Booth

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|--|
| OAC rule 3745-31-05(A)(3) | <p>Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 195 pounds per day (lbs/day) from coatings only.</p> <p>See terms and conditions A.2.a and A.2.b.</p> <p>The daily emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with this limitation.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).</p> |
| OAC rule 3745-31-02(A)(2) Voluntary restriction to avoid OAC rule 3745-21-15 | <p>VOC emissions shall not exceed 24.9 TPY from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility, based on a rolling, 12-month summation.</p> <p>See terms and conditions A.2.d and B.1.</p> |
| OAC rule 3745-21-15 | Exempt: The facility-wide total VOC emissions are restricted to 24.9 TPY. |

2. Additional Terms and Conditions

- 2.a The VOC content of each coating employed in this emissions unit shall not exceed 6.49 pounds per gallon, as applied.
- 2.b The VOC content of each cleaning material employed in this emissions unit shall not exceed 5.62 pounds per gallon, as applied.

Issued: 5/15/2007

- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage, VOC content, and emission limitations.
- 2.d** The total allowable VOC emissions from emissions units R001 (Lacquer Coating Spray Booth) and R002 (Adhesive Spray Booth) shall not exceed 24.9 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the total VOC emissions for emissions units R001 and R002 combined as specified in the following table:

| <u>Month</u> | <u>Maximum Allowable Cumulative Tons of VOC Emissions</u> |
|--------------|---|
| 1 | 2.49 |
| 1-2 | 4.98 |
| 1-3 | 7.47 |
| 1-4 | 9.96 |
| 1-5 | 12.45 |
| 1-6 | 14.94 |
| 1-7 | 17.43 |
| 1-8 | 19.92 |
| 1-9 | 22.41 |
| 1-10 | 24.9 |
| 1-11 | 24.9 |
| 1-12 | 24.9 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC emissions limitation shall be based upon a rolling, 12-month summation of the VOC emissions rates.

Issued: 5/15/2007

B. Operational Restrictions

1. The maximum annual coating and cleaning material usage for emissions units R001 and R002 combined shall not exceed 3,843 gallons for coatings and 2,482 gallons for adhesives, and 2,190 gallons for cleaning materials, based on a rolling, 12-month summation of the usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the total coatings usage for emissions units R001 and R002 combined as specified in the following table:

| <u>Month</u> | <u>Maximum Allowable Cumulative Gallons of Coatings Usage</u> |
|--------------|---|
| 1 | 384 |
| 1-2 | 768 |
| 1-3 | 1,152 |
| 1-4 | 1,536 |
| 1-5 | 1,920 |
| 1-6 | 2,304 |
| 1-7 | 2,688 |
| 1-8 | 3,072 |
| 1-9 | 3,456 |
| 1-10 | 3,843 |
| 1-11 | 3,843 |
| 1-12 | 3,843 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coatings usage limitation shall be based upon a rolling, 12-month summation of the coatings usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the total adhesives usage for emissions units R001 and R002 combined as specified in the following table:

| <u>Month</u> | <u>Maximum Allowable Cumulative Gallons of Adhesives Usage</u> |
|--------------|--|
| 1 | 248 |

Emissions Unit ID: **R001**

| | |
|------|-------|
| 1-2 | 496 |
| 1-3 | 744 |
| 1-4 | 992 |
| 1-5 | 1,240 |
| 1-6 | 1,488 |
| 1-7 | 1,736 |
| 1-8 | 1,984 |
| 1-9 | 2,232 |
| 1-10 | 2,482 |
| 1-11 | 2,482 |
| 1-12 | 2,482 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesives usage limitation shall be based upon a rolling, 12-month summation of the adhesives usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the total cleaning material usage for emissions units R001 and R002 combined as specified in the following table:

| <u>Month</u> | <u>Maximum Allowable Cumulative Gallons of Cleaning Material Usage</u> |
|--------------|--|
| 1 | 219 |
| 1-2 | 438 |
| 1-3 | 657 |
| 1-4 | 876 |
| 1-5 | 1,095 |
| 1-6 | 1,314 |
| 1-7 | 1,533 |
| 1-8 | 1,752 |
| 1-9 | 1,971 |
| 1-10 | 2,190 |
| 1-11 | 2,190 |
| 1-12 | 2,190 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual cleaning material usage limitation shall be based upon a rolling, 12-month summation of the cleaning material usage rates.

Issued: 5/15/2007

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions units R001 and R002 combined:
 - a. the name and identification number of each coating, cleaning, washoff and gluing material employed. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.
 - b. the volume, in gallons, of each coating, cleaning, washoff and gluing material employed;
 - c. the VOC content of each coating, cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied;
 - d. the amount of VOC emitted for all coating, cleaning, washoff and gluing materials employed, in pounds per month (b x c);
 - e. the rolling, 12-month* usage for coating, cleaning, washoff and gluing materials, in gallons;
 - f. the rolling, 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place);
- *A rolling, 12-month period includes the previous set of 12 calendar months.
- g. monthly records shall be completed within 15 days following the end of each calendar month and shall include the updated rolling, 12-month VOC emission rate.

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

Issued: 5/15/2007

2. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from their date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.

3. The permit to install for emissions units R001 and R002 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lb/hr): 1.86

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 82

MAGLC (ug/m3): 4,486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");

Emissions Unit ID: **R001**

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

D. Reporting Requirements

1. The permittee shall submit quarterly reports to the Hamilton County Department of Environmental Services which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY and the updated rolling, 12-month summation of the coating, adhesive, and cleaning material usages for each calendar month from emissions units R001 and R002, combined. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.) Exceeding the rolling, 12-month limitation is a violation for each day of the last month of each 12 month period in which the limitation is exceeded, regardless of whether a compliance plan is submitted.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e VOC contents) and/or any exceedances of the 195 pounds per day VOC emission limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
3. If the facility (R001 and R002) has a rolling, 12 month record that exceeds 24.9 tons of VOC from combined operations associated with the manufacture of wood furniture, or wood furniture components, the permittee shall submit the following:
 - a. Within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Hamilton County Department of Environmental Services that the VOC emission limitation was exceeded;

Emissions Unit ID: R001

- b. Within three months after the end of that rolling, 12-month period in which the exceedance occurred, a compliance plan to the Hamilton County Department of Environmental Services to comply with the presumptive RACT standards specified within USEPA document EPA-453/R-96-007 "Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations" (April 1996). Any divergence from the presumptive RACT standards and the model rule provided within that document shall be described at the time of the submittal of the 3-month compliance plan. Compliance with the presumptive RACT standards is to be achieved within 12 months after the rolling, 12-month period exceedance, unless otherwise requested by the permittee and approved by USEPA as a revision to Ohio's state implementation plan for ozone;
 - c. Exceeding the 24.9 TPY VOC emission limitation is a violation for each day of the last month of each 12 month period in which the 24.9 TPY emission limitation is exceeded, regardless of whether a compliance plan is submitted.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

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

Emission Limitation:

195 lbs of VOC/day from coatings only.

Applicable Compliance Method:

For coatings, the calculations are demonstrated in the following equation:

VOC content (in lbs of VOC/gallon) * material usage rate (gallons/day) = pounds of VOC per day.

VOC Content Limitations:

6.49 lbs/gallon for coatings, and 5.62 lbs/gallon for cleaning materials.

Applicable Compliance Method:

OAC rule 3745-21-10(B) shall be used to determine the density of the VOC contents of the coatings, cleaning materials, washoff materials, and gluing materials. If pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or

Issued: 5/15/2007

Method 24A cannot be used, the permittee shall notify the Administrator of USEPA and shall use formulation data for the material to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with the material usage limitations specified in term and condition B.1 shall be based upon the record keeping requirements specified in term and condition C.1 of this permit.
3. Compliance with the emission limitation of 24.9 TPY VOC from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility combined, based on a rolling 12-month summation shall be demonstrated by the recordkeeping requirements in term and condition C.1.

F. Miscellaneous Requirements

1. This permit limits the potential emissions of volatile organic compounds from the wood furniture finishing processes and associated cleaning, washoff and gluing processes located at this facility to no more than 24.9 TPY during any rolling, 12-month period. Should VOC emissions from the wood finishing processes and associated cleaning, washoff and gluing processes exceed 24.9 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days. See term D.3.

Issued: 5/15/2007

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.

Operations, Property, and/or Equipment -(R002) - Adhesive Spray Booth

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|--|---|
| OAC rule 3745-31-05(A)(3) | <p>Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 97 pounds per day (lbs/day) from coatings only.</p> <p>See terms and conditions A.2.a and A.2.b.</p> <p>The daily emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with this limitation.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-02(A)(2).</p> |
| OAC rule 3745-31-02(A)(2) Voluntary restriction to avoid OAC rule 3745-21-15 | <p>VOC emissions shall not exceed 24.9 TPY from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility, based on a rolling, 12-month summation.</p> <p>See terms and conditions A.2.d and B.1.</p> |
| OAC rule 3745-21-15 | Exempt: The facility-wide total VOC emissions are restricted to 24.9 TPY. |

2. Additional Terms and Conditions

- 2.a** The VOC content of each coating employed in this emissions unit shall not exceed 5.03 pounds per gallon, as applied.
- 2.b** The VOC content of each cleaning material employed in this emissions unit shall not exceed 5.62 pounds per gallon, as applied.

Emissions Unit ID: R002

- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage, VOC content, and emission limitations.
- 2.d** The total allowable VOC emissions from emissions units R001 (Lacquer Coating Spray Booth) and R002 (Adhesive Spray Booth) shall not exceed 24.9 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the total VOC emissions for emissions units R001 and R002 combined as specified in the following table:

| <u>Month</u> | <u>Maximum Allowable Cumulative Tons of VOC Emissions</u> |
|--------------|---|
| 1 | 2.49 |
| 1-2 | 4.98 |
| 1-3 | 7.47 |
| 1-4 | 9.96 |
| 1-5 | 12.45 |
| 1-6 | 14.94 |
| 1-7 | 17.43 |
| 1-8 | 19.92 |
| 1-9 | 22.41 |
| 1-10 | 24.9 |
| 1-11 | 24.9 |
| 1-12 | 24.9 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC emissions limitation shall be based upon a rolling, 12-month summation of the VOC emissions rates.

Issued: 5/15/2007

B. Operational Restrictions

1. The maximum annual coating and cleaning material usage for emissions units R001 and R002 combined shall not exceed 3,843 gallons for coatings and 2,482 gallons for adhesives, and 2,190 gallons for cleaning materials, based on a rolling, 12-month summation of the usage figures.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the total coatings usage for emissions units R001 and R002 combined as specified in the following table:

| <u>Month</u> | <u>Maximum Allowable Cumulative Gallons of Coatings Usage</u> |
|--------------|---|
| 1 | 384 |
| 1-2 | 768 |
| 1-3 | 1,152 |
| 1-4 | 1,536 |
| 1-5 | 1,920 |
| 1-6 | 2,304 |
| 1-7 | 2,688 |
| 1-8 | 3,072 |
| 1-9 | 3,456 |
| 1-10 | 3,843 |
| 1-11 | 3,843 |
| 1-12 | 3,843 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coatings usage limitation shall be based upon a rolling, 12-month summation of the coatings usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the total adhesives usage for emissions units R001 and R002 combined as specified in the following table:

| <u>Month</u> | <u>Maximum Allowable Cumulative Gallons of Adhesives Usage</u> |
|--------------|--|
| 1 | 248 |
| 1-2 | 496 |

Custom Millcraft Corporation
DTL Application: 14 05906

Facility ID: 1409031000

Emissions Unit ID: R002

| | |
|------|-------|
| 1-3 | 744 |
| 1-4 | 992 |
| 1-5 | 1,240 |
| 1-6 | 1,488 |
| 1-7 | 1,736 |
| 1-8 | 1,984 |
| 1-9 | 2,232 |
| 1-10 | 2,482 |
| 1-11 | 2,482 |
| 1-12 | 2,482 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual adhesives usage limitation shall be based upon a rolling, 12-month summation of the adhesives usage rates.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the total cleaning material usage for emissions units R001 and R002 combined as specified in the following table:

| <u>Month</u> | <u>Maximum Allowable Cumulative Gallons of Cleaning Material Usage</u> |
|--------------|--|
| 1 | 219 |
| 1-2 | 438 |
| 1-3 | 657 |
| 1-4 | 876 |
| 1-5 | 1,095 |
| 1-6 | 1,314 |
| 1-7 | 1,533 |
| 1-8 | 1,752 |
| 1-9 | 1,971 |
| 1-10 | 2,190 |
| 1-11 | 2,190 |
| 1-12 | 2,190 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual cleaning material usage limitation shall be based upon a rolling, 12-month summation of the cleaning material usage rates.

C. Monitoring and/or Recordkeeping Requirements

Issued: 5/15/2007

1. The permittee shall collect and record the following information each month for emissions units R001 and R002 combined:
 - a. the name and identification number of each coating, cleaning, washoff and gluing material employed. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.
 - b. the volume, in gallons, of each coating, cleaning, washoff and gluing material employed;
 - c. the VOC content of each coating, cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied;
 - d. the amount of VOC emitted for all coating, cleaning, washoff and gluing materials employed, in pounds per month (b x c);
 - e. the rolling, 12-month* usage for coating, cleaning, washoff and gluing materials, in gallons;
 - f. the rolling, 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place);

*A rolling, 12-month period includes the previous set of 12 calendar months.

 - g. monthly records shall be completed within 15 days following the end of each calendar month and shall include the updated rolling, 12-month VOC emission rate.

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall maintain for this facility all purchase orders and invoices of VOC-

Issued: 5/15/2007

containing materials. The permittee shall retain such purchase orders and invoices for at least five years from their date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.

3. The permit to install for emissions units R001 and R002 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lb/hr): 1.86

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 82

MAGLC (ug/m3): 4,486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
- b. changes in the composition of the materials, or use of new materials, that would

Emissions Unit ID: **R002**

result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

D. Reporting Requirements

1. The permittee shall submit quarterly reports to the Hamilton County Department of Environmental Services which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY and the updated rolling, 12-month summation of the coating, adhesive, and cleaning material usages for each calendar month from emissions units R001 and R002, combined. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.) Exceeding the rolling, 12-month limitation is a violation for each day of the last month of each 12 month period in which the limitation is exceeded, regardless of whether a compliance plan is submitted.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e VOC contents) and/or any exceedances of the 97 pounds per day VOC emission limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
3. If the facility (R001 and R002) has a rolling, 12 month record that exceeds 24.9 tons of VOC from combined operations associated with the manufacture of wood furniture, or wood furniture components, the permittee shall submit the following:
 - a. Within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Hamilton County Department of Environmental Services that the VOC emission limitation was exceeded;
 - b. Within three months after the end of that rolling, 12-month period in which the

Issued: 5/15/2007

exceedance occurred, a compliance plan to the Hamilton County Department of Environmental Services to comply with the presumptive RACT standards specified within USEPA document EPA-453/R-96-007 "Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations" (April 1996). Any divergence from the presumptive RACT standards and the model rule provided within that document shall be described at the time of the submittal of the 3-month compliance plan. Compliance with the presumptive RACT standards is to be achieved within 12 months after the rolling, 12-month period exceedance, unless otherwise requested by the permittee and approved by USEPA as a revision to Ohio's state implementation plan for ozone;

- c. Exceeding the 24.9 TPY VOC emission limitation is a violation for each day of the last month of each 12 month period in which the 24.9 TPY emission limitation is exceeded, regardless of whether a compliance plan is submitted.
4. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

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

Emission Limitation:

97 lbs of VOC/day from coatings only.

Applicable Compliance Method:

For coatings, the calculations are demonstrated in the following equation:

VOC content (in lbs of VOC/gallon) * material usage rate (gallons/day) = pounds of VOC per day.

VOC Content Limitations:

5.03 lbs/gallon for coatings, and 5.62 lbs/gallon for cleaning materials.

Applicable Compliance Method:

OAC rule 3745-21-10(B) shall be used to determine the density of the VOC contents of the coatings, cleaning materials, washoff materials, and gluing materials. If pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or Method 24A cannot be used, the permittee shall notify the Administrator of USEPA and

Emissions Unit ID: **R002**

shall use formulation data for the material to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

2. Compliance with the material usage limitations specified in term and condition B.1 shall be based upon the record keeping requirements specified in term and condition C.1 of this permit.
3. Compliance with the emission limitation of 24.9 TPY VOC from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility combined, based on a rolling 12-month summation shall be demonstrated by the recordkeeping requirements in term and condition C.1.

F. Miscellaneous Requirements

1. This permit limits the potential emissions of volatile organic compounds from the wood furniture finishing processes and associated cleaning, washoff and gluing processes located at this facility to no more than 24.9 TPY during any rolling, 12-month period. Should VOC emissions from the wood finishing processes and associated cleaning, washoff and gluing processes exceed 24.9 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days. See term D.3.