



State of Ohio Environmental Protection Agency

Street Address:

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

Mailing Address:  
Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
HAMILTON COUNTY  
Application No: 14-04693  
Fac ID: 1431054014**

**CERTIFIED MAIL**

**DATE: 5/1/2007**

Wittrock Woodworking and Mfg Inc  
Chris Wittrock  
4201 Malsbary Road  
Cincinnati, OH 45242

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 modification 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 modification 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 modification a fee of **\$ 100** 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, Permit Issuance and Data Management Section at (614) 644-3631.

Sincerely,

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

CC: USEPA

HCDES

OH-KY-IN Regional Council of Gov.

KY

IN

**HAMILTON COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-04693 FOR AN AIR CONTAMINANT SOURCE FOR  
Wittrock Woodworking and Mfg Inc**

On 5/1/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Wittrock Woodworking and Mfg Inc**, located at **4201 Malsbary Road, Cincinnati, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-04693:

**Administrative modification to PTI 14-04693.**

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.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howard Taft Pkwy, Cincinnati, OH 45219-2660 [(513)946-7777]



**Permit To Install  
Terms and Conditions**

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

**DRAFT MODIFICATION OF PERMIT TO INSTALL 14-04693**

Application Number: 14-04693  
Facility ID: 1431054014  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Wittrock Woodworking and Mfg Inc  
Person to Contact: Chris Wittrock  
Address: 4201 Malsbary Road  
Cincinnati, OH 45242

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**4201 Malsbary Road  
Cincinnati, Ohio**

Description of proposed emissions unit(s):  
**Administrative modification to PTI 14-04693.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

---

Chris Korleski  
Director

**Wittrock Woodworking and Mfg Inc**

**Facility ID: 1431054014**

**PTI Application: 14-04693**

**Issued: To be entered upon final issuance**

**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 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)**

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.

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

**Wittrock Woodworking and Mfg Inc**  
**PTI A**  
**Issue**

**Facility ID: 1431054014**

**Emissions Unit ID: F001**

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	24.5
PMPE	22.39
PM10	7.16
Single HAP	9.9
Combined HAPs	24.9

Wittrc

PTI A

Emissions Unit ID: F001

Issued: To be entered upon final issuance

**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 - (F001) - Sawdust unloading**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 24.0 pounds per week (lbs/wk) and 0.6 ton per year (TPY). Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 7.68 lbs/wk and exceed 0.19 TPY. See term B.2. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B).
OAC rule 3745-17-07(B)	See term A.2.a.
OAC rule 3745-17-08(B)	See term B.1.

**2. Additional Terms and Conditions**

- 2.a Visible fugitive particulate emissions from emissions unit F001 shall not exceed 20 percent opacity, as a three-minute average, except as specified by rule.
- 2.b Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by limiting the amount of sawdust unloaded on an annual basis and requiring the drop height of the telescopic tube to be minimized during sawdust unloading.

**B. Operational Restrictions**

1. The drop height of the telescopic tube shall be minimized to the extent possible in order to minimize or eliminate visible emissions of fugitive dust from emissions unit F001 during sawdust unloading.

**Wittrc****PTI A**Emissions Unit ID: **F001****Issued: To be entered upon final issuance**

2. The maximum amount of sawdust unloaded shall not exceed 4000 cubic yards per year.

**C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain monthly records of the amount of sawdust unloaded.

**D. Reporting Requirements**

1. The permittee shall submit annual reports which specify the total particulate matter emissions from emissions unit F001 for the previous calendar year. Emissions shall be calculated as follows:

(amount of sawdust collected the previous year X 0.15 X 2) divided by 2000 = TPY PE

These reports shall be submitted by January 31 of each year.

2. The permittee shall submit annual reports that identify any exceedances of the annual sawdust unloaded limit, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the PE/PM10 emission limitations in these terms and conditions shall be demonstrated by the required record keeping and reports.
2. If testing is required to determine compliance with the allowable PE/PM10 emission limitations, then testing shall be conducted using the following methods:
  - a. For PE: Method 5 of 40 CFR Part 60, Appendix A shall be used.
  - b. For PM10 : Method 201 of 40 CFR Part 51, Appendix M shall be used.

Compliance with the visible particulate emissions limitation 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).

3. Compliance with the amount of sawdust unloaded limit in term and condition B.2 shall be demonstrated by the record keeping in term and condition C.1.

**Wittrock Woodworking and Mfg Inc**  
**PTI A**  
**Issue**

**Facility ID: 1431054014**

**Emissions Unit ID: F001**

**F. Miscellaneous Requirements**

1. The terms and conditions in this permit to install shall supersede permit to install 14-04693 issued on August 18, 1999 and the modification to permit to install 14-04693 issued on July 15, 2003.

Wittrc

PTI A

Emissions Unit ID: P901

Issued: To be entered upon final issuance

**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 - (P901) - Woodworking operation with baghouse - modification**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 10.87 pounds per hour (lbs/hr) and 21.79 tons per year (TPY).  Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 3.48 lbs/hr and 6.97 TPY.  See term B.1.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), 3745-17-07(B), and OAC rule 3745-17-08(B).
OAC rule 3745-17-07(A)	See term A.2.a.
OAC rule 3745-17-07(B)	See term A.2.b.
<b>OAC rule 3745-17-08(B)</b>	See term B.2.  Fugitive particulate emissions shall not exceed 0.03 grains per dry standard cubic foot.
<b>OAC rule 3745-17-11</b>	<b><i>The emission limitation established by OAC rule 3745-17-11 is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</i></b>

**2. Additional Terms and Conditions**

- 2.a Visible particulate emissions from the stack for emissions unit P901 shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

**Wittrc****PTI A**Emissions Unit ID: **P901****Issued: To be entered upon final issuance**

- 2.b** Visible fugitive particulate emissions from emissions unit P901 shall not exceed 20 percent opacity, as a three-minute average, except as specified by rule.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a baghouse.

**B. Operational Restrictions**

1. The maximum amount of sawdust collected shall not exceed 4000 cubic yards per year.
2. The permittee shall employ the use of a partial enclosure to minimize fugitive particulate emissions.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall properly install, operate and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual. The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and 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 below, 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: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does

Emissions Unit ID: **P901**

not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse shall be based upon the manufacturer's specifications until such time as required emission testing is conducted.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by Hamilton County Department of Environmental Services. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range 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.

2. The permittee shall maintain monthly records of the amount of sawdust collected in this emissions unit.

#### **D. Reporting Requirements**

1. The permittee shall submit quarterly reports that identify the following information concerning the operation of the control equipment during the operation of this emissions unit:
  - a. each period of time when the pressure drop across the baghouse field was outside of the acceptable range;
  - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
  - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
  - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

2. The permittee shall submit annual reports which specify the total particulate matter emissions from emissions unit P901 for the previous calendar year. Emissions shall be calculated as follows: [(amount of sawdust collected, in cubic yards the previous year x

**Wittrc****PTI A**Emissions Unit ID: **P901****Issued: To be entered upon final issuance**

7.88) + (amount of sawdust collected, in cubic yards the previous year x 2.99)] ÷ 2000.  
These reports shall be submitted by January 31 of each year.

3. The permittee shall submit annual reports that identify any exceedances of the annual sawdust collected limit, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

**E. Testing Requirements**

1. Compliance with the PE/PM<sub>10</sub> emission limitations in these terms and conditions shall be demonstrated by the emission calculations.
2. If testing is required to determine compliance with the allowable PE/PM<sub>10</sub> emission limitations, then testing shall be conducted using the following methods:
  - a. For PE: Method 5 of 40 CFR Part 60, Appendix A shall be used.
  - b. For PM<sub>10</sub>: Method 201 of 40 CFR part 51, Appendix M shall be used.
3. Compliance with the stack visible particulate emissions limitation 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).
4. Compliance with the fugitive visible particulate emissions limitation 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).
5. Compliance with the amount of sawdust collected limit in term and condition B.1 shall be demonstrated by the record keeping in term and condition C.2.

**F. Miscellaneous Requirements**

1. The terms and conditions in this permit to install shall supersede permit to install 14-04693 issued on August 18, 1999 and the modification to permit to install 14-04693 issued on July 15, 2003.

**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) - Wood Coating Line with Associated Cleaning, Washoff, and Gluing Processes**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compounds (VOC) emissions shall not exceed 3.5 tons per year (TPY). See terms A.2.b and B.1. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G) and OAC rule 3745-31-05(C).
OAC rule 3745-21-07(G)	VOC emissions shall not exceed 8 pounds per hour (lbs/hr) and 40 lbs per day (lbs/day).
OAC rule 3745-31-05(C) Synthetic minor to avoid Title V permitting, 40 CFR Part 63 Subpart JJ and OAC rule 3745-21-15	VOC emissions shall not exceed 24.9 TPY from emissions units R001, R002, R003, R004, R005, R006 and R008 combined, based on a rolling 12-month summation. See terms A.2.a and A.2.c.

**2. Additional Terms and Conditions**

- 2.a The total allowable volatile organic compound (VOC) emissions from all the woodfinishing processes and associated cleaning, washoff and gluing processes located at this facility 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

Wittrc

PTI A

Emissions Unit ID: R001

**Issued: To be entered upon final issuance**

*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.*

- 2.b** *The VOC content of all coating and cleanup materials employed in emissions unit R001 shall not exceed 7.0 pounds of VOC per gallon.*
- 2.c** *The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units R001, R002, R003, R004, R005, R006 and R008 combined shall not exceed 9.9 TPY\* for any single HAP and 24.9 TPY\* for any combination of HAPs. Compliance with the above limits shall be based on a rolling, 12-month summation.*  
*\* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.*

**B. Operational Restrictions**

1. *The maximum annual coating and cleanup material usage for emissions unit R001 shall not exceed 1000 gallons.*

**C. Monitoring and/or Record keeping Requirements**

1. *The permittee shall collect and record the following information each month for the entire facility:*
- a. *The name and identification number of each coating, employed;*
  - b. *The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;*
  - c. *The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];*
  - d. *The number of gallons of each coating employed;*
  - e. *The name and identification of each cleanup material employed;*
  - f. *The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;*

Wittrock Woodworking and Mfg Inc

Facility ID: 1431054014

PTI A

Issue

Emissions Unit ID: R001

- g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];*
- h. The number of gallons of each cleanup material employed;*
- i. The total individual HAP usage\*\* for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12 month period [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];*
- j. The total combined HAP usage\*\* from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].*

*\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.*

*\*\* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.*

*The permittee shall collect and record the following information for each day for emissions unit R001:*

- a. The company identification for each coating and cleanup material employed.*
- b. The number of gallons of each coating and cleanup material employed.*
- c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.*
- d. The total volatile organic compound emission rate for all coatings and cleanup materials, in pounds per day.*
- e. The total number of hours the emissions unit was in operation.*
- f. The average hourly volatile organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).*

**Issued: To be entered upon final issuance**

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

*The permittee shall collect and record the following information each month for emissions units R001, R002, R003, R004, R005, R006 and R008, 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.*

Emissions Unit ID: R001

*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.*

4. *The permit to install for this emissions unit (R001) 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 pollutants 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" pollutants:*

*Pollutant: isobutanol*

*TLV (ug/m3): 152*

*Maximum Hourly Emission Rate (lbs/hr): 1.42*

*Predicted 1-Hour Maximum Ground-Level*

*Concentration (ug/m3): 163*

*MAGLC (ug/m3): 3619*

*Pollutant: toluene*

*TLV (ug/m3): 188*

*Maximum Hourly Emission Rate (lbs/hr): 3.03*

*Predicted 1-Hour Maximum Ground-Level*

*Concentration (ug/m3): 347*

*MAGLC (ug/m3): 4476*

5. *The above described evaluation determined that the maximum ground level concentrations 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*

Wittrc

PTI A

Emissions Unit ID: R001

**Issued: To be entered upon final issuance**

*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 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**

*The permittee shall submit deviation (excursion) reports which include the following information:*

- a. An identification of each hour during which the volatile organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual volatile organic compound emissions for each such hour.*
- b. An identification of each day during which the volatile organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual volatile organic compound emissions for each such day.*
- c. Any exceedance of the coating and cleanup material VOC content or gallon usage limitations.*

*If no exceedances occurred during the reporting period then a report is required stating so.*

*The permittee shall submit annual reports which specify the total volatile organic compound emissions from emissions units R001 for the previous calendar year. These reports shall be submitted by January 31 of each year.*

*The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.*

*4. If the facility (R001, R002, R003, R004, R005, R006 and R008) 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 limit was exceeded .*
- 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 limit is a violation for each day of the last month of each 12 month period in which the 24.9 TPY limit is exceeded , regardless of whether a compliance plan is submitted.*

Wittrc

PTI A

Emissions Unit ID: R001

**Issued: To be entered upon final issuance**

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 VOC emission limitations in these terms and conditions shall be demonstrated by the required record keeping in T&C C.2.
2. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning, washoff and gluing materials employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, cleaning, washoff or gluing material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for the coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
3. Compliance with the HAP limitations outlined in Term A.2.d shall be demonstrated by the record keeping in Term C.1.
4. Compliance with the gallon usage restriction in T&C B.1 shall be demonstrated by the record keeping in Term C.2.
5. Compliance with the emission limit of 24.9 TPY VOC from emissions units R001, R002, R003, R004, R005, R006 and R008, combined, based on a rolling 12-month summation shall be demonstrated by the record keeping requirements in term and condition C.3.

**F. Miscellaneous Requirements**

1. This federally enforceable permit limits the potential emissions of 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.4.
2. The following terms and conditions of this permit are federally enforceable: A, except for the following two citations: ORC 3704.03(F)(4)(d) and OAC 3745-114-01 listed in term

**Wittrock Woodworking and Mfg Inc**  
**PTI A**  
**Issue**

**Facility ID: 1431054014**

**Emissions Unit ID: R001**

*A, B, C.1-C.3, D, and E.*

3. *The terms and conditions in this permit to install shall supersede permit to install 14-04693 issued on August 18, 1999 and the modification to permit to install 14-04693 issued on July 15, 2003.*

Wittrc

PTI A

Emissions Unit ID: R002

Issued: To be entered upon final issuance

**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) - Wood Coating Line with Associated Cleaning, Washoff, and Gluing Processes**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p><i>Volatile organic compounds (VOC) emissions shall not exceed 3.5 tons per year (TPY). See terms A.2.b and B.1. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G) and OAC rule 3745-31-05(C).</i></p>
<b>OAC rule 3745-21-07(G)</b>	VOC emissions shall not exceed 8 pounds per hour (lbs/hr) and 40 lbs per day (lbs/day).
<b>OAC rule 3745-31-05(C) Synthetic minor to avoid Title V permitting, 40 CFR Part 63 Subpart JJ and OAC rule 3745-21-15</b>	VOC emissions shall not exceed 24.9 TPY from emissions units R001, R002, R003, R004, R005, R006 and R008 combined, based on a rolling 12-month summation. See terms A.2.a and A.2.c.

**2. Additional Terms and Conditions**

- 2.a The total allowable volatile organic compound (VOC) emissions from all the woodfinishing processes and associated cleaning, washoff and gluing processes located at this facility 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

Wittrc

PTI A

Emissions Unit ID: **R002****Issued: To be entered upon final issuance**

substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.

- 2.b** The VOC content of all coating and cleanup materials employed in emissions unit R002 shall not exceed 7.0 pounds of VOC per gallon.
- 2.c** The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units R001, R002, R003, R004, R005, R006 and R008 combined shall not exceed 9.9 TPY\* for any single HAP and 24.9 TPY\* for any combination of HAPs. Compliance with the above limits shall be based on a rolling, 12-month summation.
- \* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

**B. Operational Restrictions**

1. The maximum annual coating and cleanup material usage for emissions unit R002 shall not exceed 1000 gallons.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification number of each coating, employed;
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
  - d. The number of gallons of each coating employed;
  - e. The name and identification of each cleanup material employed;
  - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
  - g. The total combined HAP content of each cleanup material in pounds of

**Wittrock Woodworking and Mfg Inc**

**PTI A**

**Issue**

**Facility ID: 1431054014**

**Emissions Unit ID: R002**

combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];

- h. The number of gallons of each cleanup material employed;
- i. The total individual HAP usage\*\* for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12 month period [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
- j. The total combined HAP usage\*\* from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

\*\* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

The permittee shall collect and record the following information for each day for emissions unit R002:

- a. The company identification for each coating and cleanup material employed.
- b. The number of gallons of each coating and cleanup material employed.
- c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
- d. The total volatile organic compound emission rate for all coatings and cleanup materials, in pounds per day.
- e. The total number of hours the emissions unit was in operation.
- f. The average hourly volatile organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any

**Wittrc****PTI A**Emissions Unit ID: **R002****Issued: To be entered upon final issuance**

thinning solvents added at the emissions unit.]

The permittee shall collect and record the following information each month for emissions units R001, R002, R003, R004, R005, R006 and R008, 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: To be entered upon final issuance**

4. The permit to install for this emissions unit (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 pollutants 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" pollutants:

Pollutant: isobutanol

TLV (ug/m3): 152

Maximum Hourly Emission Rate (lbs/hr): 1.42

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 163

MAGLC (ug/m3): 3619

Pollutant: toluene

TLV (ug/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 3.03

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 347

MAGLC (ug/m3): 4476

5. The above described evaluation determined that the maximum ground level concentrations 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,

**Wittrock Woodworking and Mfg Inc**  
**PTI A**  
**Issue**

**Facility ID: 1431054014**

**Emissions Unit ID: R002**

Biological Exposure Indices");

- 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**

The permittee shall submit deviation (excursion) reports which include the following information:

- a. An identification of each hour during which the volatile organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual volatile organic compound emissions for each such hour.
- b. An identification of each day during which the volatile organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual volatile organic compound emissions for each such day.

**Wittrc****PTI A**Emissions Unit ID: **R002****Issued: To be entered upon final issuance**

- c. Any exceedance of the coating and cleanup material VOC content or gallon usage limitations.

If no exceedances occurred during the reporting period then a report is required stating so.

The permittee shall submit annual reports which specify the total volatile organic compound emissions from emissions units R002 for the previous calendar year. These reports shall be submitted by January 31 of each year.

The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

If the facility (R001, R002, R003, R004, R005, R006 and R007:) 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 limit was exceeded .
- 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.

**Wittrock Woodworking and Mfg Inc**

**PTI A**

**Issue**

**Facility ID: 1431054014**

**Emissions Unit ID: R002**

- c. Exceeding the 24.9 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 24.9 TPY limit is exceeded , regardless of whether a compliance plan is submitted.

. 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.

**Wittrc****PTI A**Emissions Unit ID: **R002****Issued: To be entered upon final issuance****E. Testing Requirements**

1. Compliance with the VOC emission limitations in these terms and conditions shall be demonstrated by the required record keeping in T&C C.2.
2. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning, washoff and gluing materials employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, cleaning, washoff or gluing material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for the coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
3. Compliance with the HAP limitations outlined in Term A.2.d shall be demonstrated by the record keeping in Term C.1.
4. Compliance with the gallon usage restriction in T&C B.1 shall be demonstrated by the record keeping in Term C.2.
5. Compliance with the emission limit of 24.9 TPY VOC from emissions units R001, R002, R003, R004, R005, R006 and R007, combined, based on a rolling 12-month summation shall be demonstrated by the record keeping requirements in term and condition C.3.

**F. Miscellaneous Requirements**

1. This federally enforceable permit limits the potential emissions of 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.4.
2. The following terms and conditions of this permit are federally enforceable: A, except for the following two citations: ORC 3704.03(F)(4)(d) and OAC 3745-114-01 listed in term A, B, C.1-C.3, D, and E.
3. The terms and conditions in this permit to install shall supersede permit to install 14-04693 issued on August 18, 1999 and the modification to permit to install 14-04693 issued on July 15, 2003.

33

**Wittrc**

**PTI A**

**Issued: To be entered upon final issuance**

Emissions Unit ID: **R002**

Wittrc

PTI A

Emissions Unit ID: **R003**

Issued: To be entered upon final issuance

**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 - (R003) - Wood Coating Line with Associated Cleaning, Washoff, and Gluing Processes**

<b><i>Applicable Rules/Requirements</i></b>	<b><i>Applicable Emissions Limitations/Control Measures</i></b>
<b><i>OAC rule 3745-31-05(A)(3)</i></b>	<i>Volatile organic compounds (VOC) emissions shall not exceed 3.5 tons per year (TPY). See terms A.2.b and B.1. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G) and OAC rule 3745-31-05(C).</i>
<b><i>OAC rule 3745-21-07(G)</i></b>	VOC emissions shall not exceed 8 pounds per hour (lbs/hr) and 40 lbs per day (lbs/day).
<b><i>OAC rule 3745-31-05(C) Synthetic minor to avoid Title V permitting, 40 CFR Part 63 Subpart JJ and OAC rule 3745-21-15</i></b>	VOC emissions shall not exceed 24.9 TPY from emissions units R001, R002, R003, R004, R005, R006 and R008 combined, based on a rolling 12-month summation. See terms A.2.a and A.2.c.

**2. Additional Terms and Conditions**

- 2.a The total allowable volatile organic compound (VOC) emissions from all the woodfinishing processes and associated cleaning, washoff and gluing processes located at this facility 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.

- 2.b** The VOC content of all coating and cleanup materials employed in emissions unit R003 shall not exceed 7.0 pounds of VOC per gallon.
- 2.c** The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units R001, R002, R003, R004, R005, R006 and R008 combined shall not exceed 9.9 TPY\* for any single HAP and 24.9 TPY\* for any combination of HAPs. Compliance with the above limits shall be based on a rolling, 12-month summation.
- \* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

## **B. Operational Restrictions**

1. The maximum annual coating and cleanup material usage for emissions unit R003 shall not exceed 1000 gallons.

## **C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification number of each coating, employed;
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
  - d. The number of gallons of each coating employed;
  - e. The name and identification of each cleanup material employed;
  - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
  - g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual

**Wittrc****PTI A**Emissions Unit ID: **R003****Issued: To be entered upon final issuance**

HAP contents from (f)];

- h. The number of gallons of each cleanup material employed;
- i. The total individual HAP usage\*\* for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12 month period [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
- j. The total combined HAP usage\*\* from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

\*\* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

The permittee shall collect and record the following information for each day for emissions unit R003:

- a. The company identification for each coating and cleanup material employed.
- b. The number of gallons of each coating and cleanup material employed.
- c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
- d. The total volatile organic compound emission rate for all coatings and cleanup materials, in pounds per day.
- e. The total number of hours the emissions unit was in operation.
- f. The average hourly volatile organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

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

The permittee shall collect and record the following information each month for emissions units R001, R002, R003, R004, R005, R006 and R008, 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.

Wittrc

PTI A

Emissions Unit ID: R003

**Issued: To be entered upon final issuance**

4. The permit to install for this emissions unit (R003) 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 pollutants 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" pollutants:

Pollutant: isobutanol

TLV (ug/m3): 152

Maximum Hourly Emission Rate (lbs/hr): 1.42

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 163

MAGLC (ug/m3): 3619

Pollutant: toluene

TLV (ug/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 3.03

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 347

MAGLC (ug/m3): 4476

5. The above described evaluation determined that the maximum ground level concentrations 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");

**Wittrock Woodworking and Mfg Inc**  
**PTI A**  
**Issue**

**Facility ID: 1431054014**

**Emissions Unit ID: R003**

- 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**

The permittee shall submit deviation (excursion) reports which include the following information:

- a. An identification of each hour during which the volatile organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual volatile organic compound emissions for each such hour.
- b. An identification of each day during which the volatile organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual volatile organic compound emissions for each such day.

**Wittrock Woodworking and Mfg Inc**  
**PTI A**  
**Issue**

**Facility ID: 1431054014**

**Emissions Unit ID: R003**

- c. Any exceedance of the coating and cleanup material VOC content or gallon usage limitations.

If no exceedances occurred during the reporting period then a report is required stating so.

The permittee shall submit annual reports which specify the total volatile organic compound emissions from emissions units R003 for the previous calendar year. These reports shall be submitted by January 31 of each year.

The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

If the facility (R001, R002, R003, R004, R005, R006 and R007:) 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 limit was exceeded .
- 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 limit is a violation for each day of the last month of

**Wittrc**

**PTI A**

Emissions Unit ID: **R003**

**Issued: To be entered upon final issuance**

each 12 month period in which the 24.9 TPY limit is exceeded , regardless of whether a compliance plan is submitted.

. 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.

**Wittrc****PTI A**Emissions Unit ID: **R003****Issued: To be entered upon final issuance****E. Testing Requirements**

1. Compliance with the VOC emission limitations in these terms and conditions shall be demonstrated by the required record keeping in T&C C.2.
2. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning, washoff and gluing materials employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, cleaning, washoff or gluing material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for the coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
3. Compliance with the HAP limitations outlined in Term A.2.d shall be demonstrated by the record keeping in Term C.1.
4. Compliance with the gallon usage restriction in T&C B.1 shall be demonstrated by the record keeping in Term C.2.
5. Compliance with the emission limit of 24.9 TPY VOC from emissions units R001, R002, R003, R004, R005, R006 and R007, combined, based on a rolling 12-month summation shall be demonstrated by the record keeping requirements in term and condition C.3.

**F. Miscellaneous Requirements**

1. This federally enforceable permit limits the potential emissions of 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.4.
2. The following terms and conditions of this permit are federally enforceable: A, except for the following two citations: ORC 3704.03(F)(4)(d) and OAC 3745-114-01 listed in term A, B, C.1-C.3, D, and E.
3. The terms and conditions in this permit to install shall supersede permit to install 14-04693 issued on August 18, 1999 and the modification to permit to install 14-04693 issued on July 15, 2003.

**Wittrock Woodworking and Mfg Inc**  
**PTI A**  
**Issue**

**Facility ID: 1431054014**

**Emissions Unit ID: R003**

Wittrc

PTI A

Emissions Unit ID: **R004**

Issued: To be entered upon final issuance

**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 - (R004) - Wood Coating Line with Associated Cleaning, Washoff, and Gluing Processes**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
<i>OAC rule 3745-31-05(A)(3)</i>	<i>Volatile organic compounds (VOC) emissions shall not exceed 3.5 tons per year (TPY). See terms A.2.b and B.1. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G) and OAC rule 3745-31-05(C).</i>
<b>OAC rule 3745-21-07(G)</b>	VOC emissions shall not exceed 8 pounds per hour (lbs/hr) and 40 lbs per day (lbs/day).
<b>OAC rule 3745-31-05(C)</b> <b>Synthetic minor to avoid Title V permitting, 40 CFR Part 63 Subpart JJ and OAC rule 3745-21-15</b>	VOC emissions shall not exceed 24.9 TPY from emissions units R001, R002, R003, R004, R005, R006 and R008 combined, based on a rolling 12-month summation.  See terms A.2.a and A.2.c.

**2. Additional Terms and Conditions**

- 2.a The total allowable volatile organic compound (VOC) emissions from all the woodfinishing processes and associated cleaning, washoff and gluing processes located at this facility 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

Wittrc

PTI A

Emissions Unit ID: **R004****Issued: To be entered upon final issuance**

substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.

- 2.b** The VOC content of all coating and cleanup materials employed in emissions unit R004 shall not exceed 7.0 pounds of VOC per gallon.
- 2.c** The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units R001, R002, R003, R004, R005, R006 and R008 combined shall not exceed 9.9 TPY\* for any single HAP and 24.9 TPY\* for any combination of HAPs. Compliance with the above limits shall be based on a rolling, 12-month summation.  
\* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

**B. Operational Restrictions**

1. The maximum annual coating and cleanup material usage for emissions unit R004 shall not exceed 1000 gallons.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification number of each coating, employed;
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
  - d. The number of gallons of each coating employed;
  - e. The name and identification of each cleanup material employed;
  - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
  - g. The total combined HAP content of each cleanup material in pounds of

combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];

- h. The number of gallons of each cleanup material employed;
- i. The total individual HAP usage\*\* for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12 month period [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
- j. The total combined HAP usage\*\* from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

\*\* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

The permittee shall collect and record the following information for each day for emissions unit R004:

- a. The company identification for each coating and cleanup material employed.
- b. The number of gallons of each coating and cleanup material employed.
- c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
- d. The total volatile organic compound emission rate for all coatings and cleanup materials, in pounds per day.
- e. The total number of hours the emissions unit was in operation.
- f. The average hourly volatile organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

**Wittrc****PTI A**Emissions Unit ID: **R004****Issued: To be entered upon final issuance**

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

The permittee shall collect and record the following information each month for emissions units R001, R002, R003, R004, R005, R006 and R008, 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.

4. The permit to install for this emissions unit (R004) 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 pollutants 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" pollutants:

Pollutant: isobutanol

TLV (ug/m3): 152

Maximum Hourly Emission Rate (lbs/hr): 1.42

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 163

MAGLC (ug/m3): 3619

Pollutant: toluene

TLV (ug/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 3.03

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 347

MAGLC (ug/m3): 4476

5. The above described evaluation determined that the maximum ground level concentrations 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");

**Wittrc****PTI A**Emissions Unit ID: **R004****Issued: To be entered upon final issuance**

- 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**

The permittee shall submit deviation (excursion) reports which include the following information:

- a. An identification of each hour during which the volatile organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual volatile organic compound emissions for each such hour.
- b. An identification of each day during which the volatile organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual volatile organic compound emissions for each such day.

**Wittrock Woodworking and Mfg Inc**  
**PTI A**  
**Issue**

**Facility ID: 1431054014**

**Emissions Unit ID: R004**

- c. Any exceedance of the coating and cleanup material VOC content or gallon usage limitations.

If no exceedances occurred during the reporting period then a report is required stating so.

The permittee shall submit annual reports which specify the total volatile organic compound emissions from emissions units R004 for the previous calendar year. These reports shall be submitted by January 31 of each year.

The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

If the facility (R001, R002, R003, R004, R005, R006 and R007:) 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 limit was exceeded .
- 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 limit is a violation for each day of the last month of

**Wittrc**

**PTI A**

Emissions Unit ID: **R004**

**Issued: To be entered upon final issuance**

each 12 month period in which the 24.9 TPY limit is exceeded , regardless of whether a compliance plan is submitted.

. 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.

**Wittrc****PTI A**Emissions Unit ID: **R004****Issued: To be entered upon final issuance****E. Testing Requirements**

1. Compliance with the VOC emission limitations in these terms and conditions shall be demonstrated by the required record keeping in T&C C.2.
2. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning, washoff and gluing materials employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, cleaning, washoff or gluing material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for the coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
3. Compliance with the HAP limitations outlined in Term A.2.d shall be demonstrated by the record keeping in Term C.1.
4. Compliance with the gallon usage restriction in T&C B.1 shall be demonstrated by the record keeping in Term C.2.
5. Compliance with the emission limit of 24.9 TPY VOC from emissions units R001, R002, R003, R004, R005, R006 and R007, combined, based on a rolling 12-month summation shall be demonstrated by the record keeping requirements in term and condition C.3.

**F. Miscellaneous Requirements**

1. This federally enforceable permit limits the potential emissions of 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.4.
2. The following terms and conditions of this permit are federally enforceable: A, except for the following two citations: ORC 3704.03(F)(4)(d) and OAC 3745-114-01 listed in term A, B, C.1-C.3, D, and E.
3. The terms and conditions in this permit to install shall supersede permit to install 14-04693 issued on August 18, 1999 and the modification to permit to install 14-04693 issued on July 15, 2003.

**Wittrock Woodworking and Mfg Inc**  
**PTI A**  
**Issue**

**Facility ID: 1431054014**

**Emissions Unit ID: R004**

Wittrc

PTI A

Emissions Unit ID: R005

Issued: To be entered upon final issuance

**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 - (R005) - Wood Coating Line with Associated Cleaning, Washoff, and Gluing Processes**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile organic compounds (VOC) emissions shall not exceed 3.5 tons per year (TPY). See terms A.2.b and B.1. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G) and OAC rule 3745-31-05(C).
<b>OAC rule 3745-21-07(G)</b>	VOC emissions shall not exceed 8 pounds per hour (lbs/hr) and 40 lbs per day (lbs/day).
<b>OAC rule 3745-31-05(C)</b> <b>Synthetic minor to avoid Title V permitting, 40 CFR Part 63 Subpart JJ and OAC rule 3745-21-15</b>	VOC emissions shall not exceed 24.9 TPY from emissions units R001, R002, R003, R004, R005, R006 and R008 combined, based on a rolling 12-month summation. See terms A.2.a and A.2.c.

**2. Additional Terms and Conditions**

- 2.a The total allowable volatile organic compound (VOC) emissions from all the woodfinishing processes and associated cleaning, washoff and gluing processes located at this facility 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

**Wittrc****PTI A**Emissions Unit ID: **R005****Issued: To be entered upon final issuance**

substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.

- 2.b** The VOC content of all coating and cleanup materials employed in emissions unit R005 shall not exceed 7.0 pounds of VOC per gallon.
- 2.c** The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units R001, R002, R003, R004, R005, R006 and R008 combined shall not exceed 9.9 TPY\* for any single HAP and 24.9 TPY\* for any combination of HAPs. Compliance with the above limits shall be based on a rolling, 12-month summation.  
\* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

**B. Operational Restrictions**

1. The maximum annual coating and cleanup material usage for emissions unit R005 shall not exceed 1000 gallons.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification number of each coating, employed;
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
  - d. The number of gallons of each coating employed;
  - e. The name and identification of each cleanup material employed;
  - f. The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
  - g. The total combined HAP content of each cleanup material in pounds of

combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];

- h. The number of gallons of each cleanup material employed;
- i. The total individual HAP usage\*\* for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12 month period [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
- j. The total combined HAP usage\*\* from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

\*\* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

The permittee shall collect and record the following information for each day for emissions unit R005:

- a. The company identification for each coating and cleanup material employed.
- b. The number of gallons of each coating and cleanup material employed.
- c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
- d. The total volatile organic compound emission rate for all coatings and cleanup materials, in pounds per day.
- e. The total number of hours the emissions unit was in operation.
- f. The average hourly volatile organic compound emission rate for all coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average).

**Issued: To be entered upon final issuance**

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

The permittee shall collect and record the following information each month for emissions units R001, R002, R003, R004, R005, R006 and R008, 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.

Wittrc

PTI A

Emissions Unit ID: R005

**Issued: To be entered upon final issuance**

4. The permit to install for this emissions unit (R005) 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 pollutants 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" pollutants:

Pollutant: isobutanol

TLV (ug/m3): 152

Maximum Hourly Emission Rate (lbs/hr): 1.42

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 163

MAGLC (ug/m3): 3619

Pollutant: toluene

TLV (ug/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 3.03

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 347

MAGLC (ug/m3): 4476

5. The above described evaluation determined that the maximum ground level concentrations 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,

**Wittrock Woodworking and Mfg Inc**  
**PTI A**  
**Issue**

**Facility ID: 1431054014**

**Emissions Unit ID: R005**

Biological Exposure Indices");

- 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**

The permittee shall submit deviation (excursion) reports which include the following information:

- a. An identification of each hour during which the volatile organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual volatile organic compound emissions for each such hour.
- b. An identification of each day during which the volatile organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual volatile organic compound emissions for each such day.

**Wittrc****PTI A**Emissions Unit ID: **R005****Issued: To be entered upon final issuance**

- c. Any exceedance of the coating and cleanup material VOC content or gallon usage limitations.

If no exceedances occurred during the reporting period then a report is required stating so.

The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R005 for the previous calendar year. These reports shall be submitted by January 31 of each year.

The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

If the facility (R001, R002, R003, R004, R005, R006 and R007:) 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 limit was exceeded .
- 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.

**Wittrock Woodworking and Mfg Inc**

**PTI A**

**Issue**

**Facility ID: 1431054014**

**Emissions Unit ID: R005**

- c. Exceeding the 24.9 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 24.9 TPY limit is exceeded , regardless of whether a compliance plan is submitted.

. 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.

**Wittrc****PTI A**Emissions Unit ID: **R005****Issued: To be entered upon final issuance****E. Testing Requirements**

1. Compliance with the VOC emission limitations in these terms and conditions shall be demonstrated by the required record keeping in T&C C.2.
2. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning, washoff and gluing materials employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, cleaning, washoff or gluing material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for the coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
3. Compliance with the HAP limitations outlined in Term A.2.d shall be demonstrated by the record keeping in Term C.1.
4. Compliance with the gallon usage restriction in T&C B.1 shall be demonstrated by the record keeping in Term C.2.
5. Compliance with the emission limit of 24.9 TPY VOC from emissions units R001, R002, R003, R004, R005, R006 and R007, combined, based on a rolling 12-month summation shall be demonstrated by the record keeping requirements in term and condition C.3.

**F. Miscellaneous Requirements**

1. This federally enforceable permit limits the potential emissions of 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.4.
2. The following terms and conditions of this permit are federally enforceable: A, except for the following two citations: ORC 3704.03(F)(4)(d) and OAC 3745-114-01 listed in term A, B, C.1-C.3, D, and E.
3. The terms and conditions in this permit to install shall supersede permit to install 14-04693 issued on August 18, 1999 and the modification to permit to install 14-04693 issued on July 15, 2003.

Wittrc

PTI A

Emissions Unit ID: R006

Issued: To be entered upon final issuance

**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 - (R006) - Wood Coating Line with Associated Cleaning, Washoff, and Gluing Processes**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
<i>OAC rule 3745-31-05(A)(3)</i>	<p><i>Volatile organic compounds (VOC) emissions shall not exceed 3.5 tons per year (TPY).</i></p> <p><i>See terms A.2.b and B.1.</i></p> <p><i>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G) and OAC rule 3745-31-05(C).</i></p>
<b>OAC rule 3745-21-07(G)</b>	VOC emissions shall not exceed 8 pounds per hour (lbs/hr) and 40 lbs per day (lbs/day).
<b>OAC rule 3745-31-05(C)</b> <b>Synthetic minor to avoid Title V permitting, 40 CFR Part 63 Subpart JJ and OAC rule 3745-21-15</b>	<p>VOC emissions shall not exceed 24.9 TPY from emissions units R001, R002, R003, R004, R005, R006 and R008 combined, based on a rolling 12-month summation.</p> <p>See terms A.2.a and A.2.c.</p>

**2. Additional Terms and Conditions**

- 2.a The total allowable volatile organic compound (VOC) emissions from all the woodfinishing processes and associated cleaning, washoff and gluing processes located at this facility 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

**Wittrock Woodworking and Mfg Inc**

**PTI A**

**Issue**

**Facility ID: 1431054014**

**Emissions Unit ID: R006**

manufacturing operations. "Washoff material" means organic solvent used to

**Issued: To be entered upon final issuance**

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.

- 2.b** The VOC content of all coating and cleanup materials employed in emissions unit R006 shall not exceed 7.0 pounds of VOC per gallon.
- 2.c** The total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from emissions units R001, R002, R003, R004, R005, R006 and R008 combined shall not exceed 9.9 TPY\* for any single HAP and 24.9 TPY\* for any combination of HAPs. Compliance with the above limits shall be based on a rolling, 12-month summation.
- \* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

**B. Operational Restrictions**

1. The maximum annual coating and cleanup material usage for emissions unit R006 shall not exceed 1000 gallons.

**C. Monitoring and/or Record keeping Requirements**

1. The permittee shall collect and record the following information each month for the entire facility:
- The name and identification number of each coating, employed;
  - The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
  - The number of gallons of each coating employed;
  - The name and identification of each cleanup material employed;
  - The individual HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;

**Wittrc****PTI A**Emissions Unit ID: **R006****Issued: To be entered upon final issuance**

- g. The total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied [sum all the individual HAP contents from (f)];
- h. The number of gallons of each cleanup material employed;
- i. The total individual HAP usage\*\* for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12 month period [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleanup material];
- j. The total combined HAP usage\*\* from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling 12 month period [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material].

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a line-by-line basis.

\*\* This assumes the amount of HAPs used is equivalent to the amount of HAPs that will evaporate and be emitted.

The permittee shall collect and record the following information for each day for emissions unit R006:

- a. The company identification for each coating and cleanup material employed.
- b. The number of gallons of each coating and cleanup material employed.
- c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
- d. The total volatile organic compound emission rate for all coatings and cleanup materials, in pounds per day.
- e. The total number of hours the emissions unit was in operation.
- f. The average hourly volatile organic compound emission rate for all coatings and

cleanup materials, i.e., (d)/(e), in pounds per hour (average).

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

The permittee shall collect and record the following information each month for emissions units R001, R002, R003, R004, R005, R006 and R008, 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.

Wittrc

PTI A

Emissions Unit ID: R006

**Issued: To be entered upon final issuance**

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.

4. The permit to install for this emissions unit (R006) 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 pollutants 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" pollutants:

Pollutant: isobutanol

TLV (ug/m3): 152

Maximum Hourly Emission Rate (lbs/hr): 1.42

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 163

MAGLC (ug/m3): 3619

Pollutant: toluene

TLV (ug/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 3.03

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 347

MAGLC (ug/m3): 4476

5. The above described evaluation determined that the maximum ground level concentrations 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

**Issued: To be entered upon final issuance**

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 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**

The permittee shall submit deviation (excursion) reports which include the following information:

- a. An identification of each hour during which the volatile organic compound emissions from the coatings and cleanup materials exceeded 8 pounds per hour, and the actual volatile organic compound emissions for each such hour.
- b. An identification of each day during which the volatile organic compound emissions from the coatings and cleanup materials exceeded 40 pounds per day, and the actual volatile organic compound emissions for each such day.
- c. Any exceedance of the coating and cleanup material VOC content or gallon usage limitations.

If no exceedances occurred during the reporting period then a report is required stating so.

The permittee shall submit annual reports which specify the total organic compound emissions from emissions units R006 for the previous calendar year. These reports shall be

**Wittrock Woodworking and Mfg Inc**  
**PTI A**  
**Issue**

**Facility ID: 1431054014**

**Emissions Unit ID: R006**

submitted by January 31 of each year.

The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in this Permit to Install. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year.

If the facility (R001, R002, R003, R004, R005, R006 and R007:) 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 limit was exceeded .
- 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 limit is a violation for each day of the last month of each 12 month period in which the 24.9 TPY limit is exceeded , regardless of whether a compliance plan is submitted.

**Issued: To be entered upon final issuance**

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 VOC emission limitations in these terms and conditions shall be demonstrated by the required record keeping in T&C C.2.
2. OAC rule 3745-21-10(B) shall be used to determine the VOC contents of the coatings, cleaning, washoff and gluing materials employed in this emissions unit. If, pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, cleaning, washoff or gluing material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for the coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.
3. Compliance with the HAP limitations outlined in Term A.2.d shall be demonstrated by the record keeping in Term C.1.
4. Compliance with the gallon usage restriction in T&C B.1 shall be demonstrated by the record keeping in Term C.2.
5. Compliance with the emission limit of 24.9 TPY VOC from emissions units R001, R002, R003, R004, R005, R006 and R007, combined, based on a rolling 12-month summation shall be demonstrated by the record keeping requirements in term and condition C.3.

#### **F. Miscellaneous Requirements**

1. This federally enforceable permit limits the potential emissions of 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.4.
2. The following terms and conditions of this permit are federally enforceable: A, except for the following two citations: ORC 3704.03(F)(4)(d) and OAC 3745-114-01 listed in

**Wittrock Woodworking and Mfg Inc**

**PTI A**

**Issue**

**Facility ID: 1431054014**

**Emissions Unit ID: R006**

term A, B, C.1-C.3, D, and E.

3. The terms and conditions in this permit to install shall supersede permit to install 14-04693 issued on August 18, 1999 and the modification to permit to install 14-04693 issued on July 15, 2003.