



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 14-05249

DATE: 4/8/2003

Art Woodworking and Manufacturing Co
Ralph Dickman
4238 Dane Street
Cincinnati, OH 45223

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

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

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: USEPA

HCDES

Kathy Clayton City of Cincinnati - OEM



**Permit To Install
Terms and Conditions**

**Issue Date: 4/8/2003
Effective Date: 4/8/2003**

FINAL PERMIT TO INSTALL 14-05249

Application Number: 14-05249
APS Premise Number: 1431070324
Permit Fee: **\$800**
Name of Facility: Art Woodworking and Manufacturing Co
Person to Contact: Ralph Dickman
Address: 4238 Dane Street
Cincinnati, OH 45223

Location of proposed air contaminant source(s) [emissions unit(s)]:
**4238 Dane Street
Cincinnati, Ohio**

Description of proposed emissions unit(s):
Modification of existing spray paint booths.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

representative of the Director, upon receipt of a written request and within a reasonable time, any 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

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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

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.

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14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	24.9

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Wood Coating Line and associated cleaning, washoff and gluing operations	OAC rule 3745-21-07(G)	8 lbs VOC/hr 40 lbs VOC/day
	OAC rule 3745-31-05(D)	7.3 TPY VOC from emissions unit R001 24.9 TPY VOC from emissions units R001, R002, R003 and R004, combined, based on a rolling 12-month summation. See terms A.2.a and A.2.b

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 total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section

112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY * for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs usage levels specified in the following table:

<u>Months(s)</u>	<u>Maximum Allowable Single HAP Usage In Tons</u>	<u>Maximum Allowable Combined HAP Usage In Tons</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

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

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit R001 for the purpose of determining compliance with OAC rule 3745-21-07(G)(2):

- a. The company identification for each coating and photochemically reactive cleaning material employed.
- b. The number of gallons of each coating and photochemically reactive cleaning material employed.
- c. The organic compound content of each coating and photochemically reactive cleaning material in pounds per gallon.
- d. The total organic compound emission rate for all coatings and photochemically reactive cleaning materials in pounds per day.
- e. The total number of hours the emissions unit was in operation.
- f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleaning 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. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions for emissions unit R001:
 - a. The company identification for each nonphotochemically reactive cleanup material employed.
 - b. The number of gallons of each nonphotochemically reactive cleanup material employed.
 - c. The organic compound content of each nonphotochemically reactive cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all nonphotochemically reactive cleanup materials, in pounds.
 - e. The annual VOC emissions rate for this emissions unit in tons per year. This shall be determined by summing the records in term C.1.d and C.2.d for the calendar year and dividing by 2000 pounds per ton.

Emissions Unit ID: **R001**

3. The permittee shall collect and record the following information each month for emissions units R001, R002, R003 and R004, 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 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 cleaning material employed.
- f. The individual HAP content for each HAP of each cleaning material, in pounds of individual HAP per gallon of cleaning material, as applied.
- g. The total combined HAP content of each cleaning material, in pounds of combined HAPs per gallon of cleaning material, as applied [sum all the individual HAP contents from (f)].

- h. The number of gallons of each cleaning material employed.
- i. The total individual HAP usage for each HAP from all coatings and cleaning materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleaning material].
- j. The total combined HAP usage from all coatings and cleaning materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleaning material].
- k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* 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 individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

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

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleaning materials exceeded 8

pounds per hour, and the actual average hourly organic compound emissions for each such day.

- b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleaning materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit annual reports which summarize the following for this emissions unit:
 - a. The total VOC emissions from emissions unit for the previous calendar year.
 - b. The total number of gallons of coating, cleaning, washoff and gluing cleanup materials employed in this emissions unit for the previous calendar year.

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

3. If the facility (emissions units R001 - R004) 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.
4. The permittee shall notify the Hamilton County Department of Environmental Services of any

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Emissions Unit ID: R001

exceedance of the HAP usage limitations set forth in term A.2.b. 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 no exceedances occurred during the reporting period then a report is required stating so.

E. Testing Requirements

1. Compliance with the organic compound emission limits of 8 pounds per hour and 40 pounds per day shall be demonstrated by the recordkeeping requirements in term and condition C.1.
2. Compliance with the emission limit of 24.9 TPY VOC from emissions units R001, R002, R003 and R004, combined, based on a rolling 12-month summation shall be demonstrated by the recordkeeping requirements in term and condition C.3.
3. Compliance with the HAP emissions limitation in term A.2.b shall be demonstrated by the record keeping in term C.4.
4. Compliance with the emission limit of 7.3 TPY VOC from emissions unit R001 shall be demonstrated by the record keeping in term C.2.
5. 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.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C., D., and E.
2. 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.3.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R002 - Wood coating line and associated cleaning, washoff and gluing operations	OAC rule 3745-31-05(A)(3)	12.98 lbs VOC/hr, coating only See terms A.2.d., A.2.e., A.2.f, B.1, B.2 and B.3. 8.52 TPY VOC from coatings and cleaning materials, based upon a rolling, 12-month summation from emissions unit R002. 24.9 TPY VOC from emission units R001, R002, R003 and R004, combined, based on a rolling 12-month summation The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)	Exempt
	OAC rule 3745-31-05(D)	See terms A.2.b and A.2.c

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Art W

PTI A

Issued: 4/8/2003

Emissions Unit ID: **R002**

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the specified mass emission rates, coating and cleanup material VOC content and usage limitations, compliance with the Air Toxics Policy, the use of non-photochemically reactive materials and compliance with the facility-wide VOC and HAPs emissions limitations.
- 2.b** 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.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 this facility shall not exceed 9.9 TPY * for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs usage levels specified in the following table:

<u>Months(s)</u>	<u>Maximum Allowable Single HAP Usage In Tons</u>	<u>Maximum Allowable Combined HAP Usage In Tons</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7

Emissions Unit ID: R002

1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

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

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

- 2.d The VOC content as applied, of each coating employed in this emissions unit shall not exceed 6.49 pounds of VOC per gallon, excluding water.
- 2.e The VOC content of each cleaning material employed in this emissions unit shall not exceed 6.58 pounds of VOC per gallon.
- 2.f The hourly emissions limitation outlined above is based upon the emission unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

B. Operational Restrictions

- 1. The maximum annual coating usage for this emissions unit shall not exceed 2500 gallons, excluding water, based upon a rolling, 12-month summation of the coating usage figures.

The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.
- 2. The maximum annual cleaning material usage shall not exceed 125 gallons.
- 3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

C. Monitoring and/or Recordkeeping 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 cleaning material employed.
- f. The individual HAP content for each HAP of each cleaning material, in pounds of individual HAP per gallon of cleaning material, as applied.
- g. The total combined HAP content of each cleaning material, in pounds of combined HAPs per gallon of cleaning material, as applied [sum all the individual HAP contents from (f)].
- h. The number of gallons of each cleaning material employed.
- i. The total individual HAP usage for each HAP from all coatings and cleaning materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleaning material].
- j. The total combined HAP usage from all coatings and cleaning materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleaning material].
- k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* 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 individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all

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Emissions Unit ID: R002

HAP(s) used evaporated.

2. The permittee shall collect and record the following information for each month for emissions unit R002 for the purpose of demonstrating compliance with the hourly and annual emission rate established under OAC 3745-31-05(A)(3) in term and condition A.1 and the material usage limitations outlined in term and condition B.:
 - a. The company identification for each coating and cleaning material employed.

- b. The number of gallons of each coating and cleaning material employed, excluding water.
- c. The organic compound content of each coating, excluding water, and cleaning material, in pounds per gallon.
- d. The total organic compound emissions rate for all coatings and cleaning materials, in pounds per day (b x c).
- e. A record indicating whether or not each coating or cleaning material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).
- f. The rolling, 12-month summation of the coating usage figures, excluding water, in gallons.
- g. The rolling, 12-month summation of the total combined VOC emissions from all coatings and cleaning materials employed, in pounds or tons.

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

- 3. The permittee shall collect and record the following information each month for emissions units R001, R002, R003 and R004 for the purpose of demonstrating compliance with the annual VOC emission rate of 24.9 TPY VOC combined, based on a rolling 12-month summation:
 - 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 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 the combined emissions units R002 and R003 was evaluated based on the actual materials(typically coatings and cleanup 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 for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model(or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the combined results of the modeling for the "worst case" pollutant(s) from combined R002 and R003:

Pollutant : Cyclohexanone

TLV (ug/m3): 100,300

Maximum Hourly Emission Rate (lbs/hr): 6.02

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 430

MAGLC (ug/m3): 2388

Pollutant : Methanol

TLV (ug/m3): 262,000

Maximum Hourly Emission Rate (lbs/hr): 29.61

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 1921

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MAGLC (ug/m3): 6238

Pollutant : 2-Methyl 1-Propanol

TLV (ug/m3): 152,000

Maximum Hourly Emission Rate (lbs/hr): 8.4

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 545

MAGLC (ug/m3): 3619

Pollutant : Formaldehyde

TLV (ug/m3): 272

Maximum Hourly Emission Rate (lbs/hr): 0.077

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 5.0

MAGLC (ug/m3): 6.5

Pollutant : 1-Butanol

TLV (ug/m3): 60,600

Maximum Hourly Emission Rate (lbs/hr): 3.5

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 227

MAGLC (ug/m3): 1443

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior

to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
6. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from the date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined by OAC rule 3745-21-07(C)(5)] was employed in this emissions unit. The report shall be submitted within 45 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in term A.2.c. 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 no exceedances occurred during the reporting period then a report is required stating so.
3. The permittee shall submit deviation reports which identify any exceedance of the coating and cleaning, washoff and gluing material VOC content or gallon usage limitations in terms A.2.d, A.2.e, B.1 and B.2.
4. The permittee shall submit annual reports which summarize the following for this emissions unit:

- a. The total VOC emissions from this emissions unit for the previous calendar year.
- b. The total number of gallons of coating, cleaning, washoff and gluing cleanup materials employed in this emissions unit for the previous calendar year.

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

5. If the facility (emissions units R001 - R004) 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.

E. Testing Requirements

1. 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.
2. Compliance with the usage limitations cited in terms B.1 and B.2. shall be demonstrated by the

record keeping in term C.2.

3. Compliance with the hourly emission rate of 12.98 lbs VOC and annual emission rate of 8.57 TPY VOC established under OAC rule 3745-31-05(A)(3) in term A.1 shall be demonstrated by the recordkeeping in term C.2.
4. Compliance with the HAP emission limits outlined in term A.2.c shall be demonstrated by the record keeping requirements in term C.1.
5. Compliance with the facility wide VOC emission limitation of 24.9 TPY VOC outlined in term A.2.b shall be demonstrated by the recordkeeping in term C.3.
6. Compliance with the term B.3. shall be demonstrated by the record keeping term C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1- C.3., D., and E.
2. This Federally Enforceable Permit to Install 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.5.
3. The terms and conditions of this permit to install shall supersede the terms and conditions of permit to install number 14-02363 issued on 9/25/91 and modified on 10/16/95.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R003 - Wood coating line and associated cleaning, washoff and gluing operations	OAC rule 3745-31-05(A)(3)	32.45 lbs VOC/hr, coating only See terms A.2.d., A.2.e., A.2.f, B.1, B.2 and B.3. 9.49 TPY VOC from coatings and cleaning materials, based upon a rolling, 12-month summation from emissions unit R003. 24.9 TPY VOC from emission units R001, R002, R003 and R004, combined, based on a rolling 12-month summation The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(2)	Exempt
	OAC rule 3745-31-05(D)	See terms A.2.b and A.2.c

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the specified mass emission rates, coating and cleanup material VOC content and usage limitations,

compliance with the Air Toxics Policy, the use of non-photochemically reactive materials and compliance with the facility-wide VOC and HAPs emissions limitations.

- 2.b** 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.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 this facility shall not exceed 9.9 TPY * for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs usage levels specified in the following table:

<u>Months(s)</u>	<u>Maximum Allowable Single HAP Usage In Tons</u>	<u>Maximum Allowable Combined HAP Usage In Tons</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

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

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

- 2.d The VOC content as applied, of each coating employed in this emissions unit shall not exceed 6.49 pounds of VOC per gallon, excluding water.
- 2.e The VOC content of each cleaning material employed in this emissions unit shall not exceed 6.58 pounds of VOC per gallon.
- 2.f The hourly emissions limitation outlined above is based upon the emission unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.

B. Operational Restrictions

1. The maximum annual coating usage for this emissions unit shall not exceed 2500 gallons, excluding water, based upon a rolling, 12-month summation of the coating usage figures.

The permittee has existing records to demonstrate compliance with the rolling, 12-month summation limit upon issuance of the permit.

2. The maximum annual cleaning material usage shall not exceed 420 gallons.
3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

C. Monitoring and/or Recordkeeping 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 cleaning material employed.
- f. The individual HAP content for each HAP of each cleaning material, in pounds of individual HAP per gallon of cleanup material, as applied.
- g. The total combined HAP content of each cleaning material, in pounds of combined HAPs per gallon of cleaning material, as applied [sum all the individual HAP contents from (f)].
- h. The number of gallons of each cleaning material employed.
- i. The total individual HAP usage for each HAP from all coatings and cleaning materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleaning material].
- j. The total combined HAP usage from all coatings and cleaning materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleaning material].
- k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* 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 individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

- 2. The permittee shall collect and record the following information for each month for emissions unit R003 for the purpose of demonstrating compliance with the daily and annual emission rate

established under OAC 3745-31-05(A)(3) in term and condition A.1 and the usage limitations outlined in term and condition B.:

- a. The company identification for each coating and cleaning material employed.
- b. The number of gallons of each coating and cleaning material employed, excluding water.
- c. The organic compound content of each coating, excluding water, and cleaning material, in pounds per gallon.
- d. The total organic compound emissions rate for all coatings and cleaning materials, in pounds per day (b x c).
- e. A record indicating whether or not each coating or cleaning material is photochemically reactive as defined in OAC rule 3745-21-01(C)(5).
- f. The rolling, 12-month summation of the coating usage figures, excluding water, in gallons.
- g. The rolling, 12-month summation of the total combined VOC emissions from all coatings and cleaning materials employed, in pounds or tons.

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

3. The permittee shall collect and record the following information each month for emissions units R001, R002, R003 and R004 for the purpose of demonstrating compliance with the annual VOC emission rate of 24.9 TPY VOC combined, based on a rolling 12-month summation:
 - 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 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 the combined emissions units R002 and R003 was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by these emissions units using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the combined results of the modeling for the "worst case" pollutant(s) from combined R002 and R003:

Pollutant : Cyclohexanone
 TLV (ug/m3): 100,300
 Maximum Hourly Emission Rate (lbs/hr): 6.02
 Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m3): 430
 MAGLC (ug/m3): 2388

Pollutant : Methanol
 TLV (ug/m3): 262,000

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Maximum Hourly Emission Rate (lbs/hr): 29.61
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 1921
MAGLC (ug/m3): 6238

Pollutant : 2-Methyl 1-Propanol
TLV (ug/m3): 152,000
Maximum Hourly Emission Rate (lbs/hr): 8.4
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 545
MAGLC (ug/m3): 3619

Pollutant : Formaldehyde
TLV (ug/m3): 272
Maximum Hourly Emission Rate (lbs/hr): 0.077
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 5.0
MAGLC (ug/m3): 6.5

Pollutant : 1-Butanol
TLV (ug/m3): 60,600
Maximum Hourly Emission Rate (lbs/hr): 3.5
Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m3): 227
MAGLC (ug/m3): 1443

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- 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.).
5. If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.
- The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"
- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
6. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from the date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined by OAC rule 3745-21-07(C)(5)] was employed in this emissions unit. The report shall be submitted within 45 days after the exceedance occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services of any

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exceedance of the HAP usage limitations set forth in term A.2.c. 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 no exceedances occurred during the reporting period then a report is required stating so.

3. The permittee shall submit deviation reports which identify any exceedance of the coating and cleaning, washoff and gluing material VOC content or gallon usage limitations in terms A.2.d, A.2.e, B.1 and B.2.
4. The permittee shall submit annual reports which summarize the following for this emissions unit:
 - a. The total VOC emissions from this emissions unit for the previous calendar year.
 - b. The total number of gallons of coating, cleaning, washoff and gluing cleanup materials employed in this emissions unit for the previous calendar year.

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

5. If the facility (emissions units R001 - R004) 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.

E. Testing Requirements

1. 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.
2. Compliance with the usage limitations cited in terms B.1 and B.2. shall be demonstrated by the record keeping in term C.2.
3. Compliance with the hourly emission rate of 32.45 lbs VOC and annual emission rate of 9.49 TPY VOC established under OAC rule 3745-31-05(A)(3) in term A.1 shall be demonstrated by the recordkeeping in term C.2.
4. Compliance with the HAP emission limits outlined in term A.2.c shall be demonstrated by the record keeping requirements in term C.1.
5. Compliance with the facility wide VOC emission limitation of 24.9 TPY VOC outlined in A.2.b shall be demonstrated by the recordkeeping in term C.3.
6. Compliance with the term B.3. shall be demonstrated by the record keeping term C.2.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C.1 - C.3., D., and E.

2. This Federally Enforceable Permit to Install 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.5.
3. The terms and conditions of this permit to install shall supersede the terms and conditions of permit to install number 14-02969 issued on 7/7/94.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R004 - Wood coating line and associated cleaning, washoff and gluing operations	OAC rule 3745-21-07(G)	8 lbs VOC/hr 40 lbs VOC/day
	OAC rule 3745-31-05(D)	7.3 TPY VOC from emissions unit R001
		24.9 TPY VOC from emissions units R001, R002, R003 and R004, combined, based on a rolling 12-month summation.
		See terms A.2.a and A.2.b

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 total allowable usage of Hazardous Air Pollutants (HAPs), as identified in Section

112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 TPY * for any single HAP and 24.9 TPY* for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAPs usage levels specified in the following table:

<u>Months(s)</u>	<u>Maximum Allowable Single HAP Usage In Tons</u>	<u>Maximum Allowable Combined HAP Usage In Tons</u>
1	0.8	2.1
1-2	1.7	4.2
1-3	2.5	6.2
1-4	3.3	8.3
1-5	4.2	10.4
1-6	5.0	12.5
1-7	5.8	14.6
1-8	6.6	16.6
1-9	7.5	18.7
1-10	8.3	20.8
1-11	9.1	22.9
1-12	9.9	24.9

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

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each day for emissions unit R004 for the purpose of determining compliance with OAC rule 3745-21-07(G)(2):

- a. The company identification for each coating and photochemically reactive cleaning material employed.

- b. The number of gallons of each coating and photochemically reactive cleaning material employed.
- c. The organic compound content of each coating and photochemically reactive cleaning material in pounds per gallon.
- d. The total organic compound emission rate for all coatings and photochemically reactive cleaning materials in pounds per day.
- e. The total number of hours the emission unit was in operation.
- f. The average hourly organic compound emission rate for all coatings and photochemically reactive cleaning 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. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

2. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions for emissions unit R004:
 - a. The company identification for each nonphotochemically reactive cleanup material employed.
 - b. The number of gallons of each nonphotochemically reactive cleanup material employed.
 - c. The organic compound content of each nonphotochemically reactive cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all nonphotochemically reactive cleanup materials, in pounds.
 - e. The annual VOC emissions rate for this emissions unit in tons per year. This shall be determined by summing the records in term C.1.d and C.2.d for the calendar year and dividing by 2000 pounds per ton.
3. The permittee shall collect and record the following information each month for emissions units R001, R002, R003 and R004, 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 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 cleaning material employed.
- f. The individual HAP content for each HAP of each cleaning material, in pounds of individual HAP per gallon of cleaning material, as applied.
- g. The total combined HAP content of each cleaning material, in pounds of combined HAPs per gallon of cleaning material, as applied [sum all the individual HAP contents from (f)].
- h. The number of gallons of each cleaning material employed.
- i. The total individual HAP usage for each HAP from all coatings and cleaning materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleaning material].
- j. The total combined HAP usage from all coatings and cleaning materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleaning material].
- k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.
- l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all months since the issuance of the PTI.

* 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 individual emissions unit basis.

** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.

5. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from the date of issuance. Upon request, the permittee shall make available to the Director of the Ohio

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EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.

D. Reporting Requirements

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

- a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleaning materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleaning materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
2. The permittee shall submit annual reports which summarize the following for this emissions unit:
- a. The total VOC emissions from emissions unit for the previous calendar year.
 - b. The total number of gallons of coating, cleaning, washoff and gluing cleanup materials employed in this emissions unit for the previous calendar year.

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

3. If the facility (emissions units R001 - R004) 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

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plan is submitted.

4. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in term A.2.b. 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 no exceedances occurred during the reporting period then a report is required stating so.

E. Testing Requirements

1. Compliance with the organic compound emission limits of 8 pounds per hour and 40 pounds per day shall be demonstrated by the recordkeeping requirements in term and condition C.1.
2. Compliance with the emission limit of 24.9 TPY VOC from emissions units R001, R002, R003 and R004, combined, based on a rolling 12-month summation shall be demonstrated by the recordkeeping requirements in term and condition C.3.
3. Compliance with the HAP emissions limitation in term A.2.b shall be demonstrated by the record keeping in term C.4.
4. Compliance with the emission limit of 7.3 TPY VOC from emissions unit R004 shall be demonstrated by the record keeping in term C.2.
5. 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.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A., B., C., D., and E.
2. 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.3.