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

3/16/2015

Certified Mail

NATHAN BAER
Sauder Manufacturing
930 West Barre Road
ARCHBOLD, OH 43502

Facility ID: 0326000204
Permit Number: P0118046
County: Fulton

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 2/5/2015. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

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

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA DAPC, Northwest District Office

Response to Comments

Facility ID:	0326000204
Facility Name:	Sauder Manufacturing
Facility Description:	Wood Furniture Manufacturing
Facility Address:	930 West Barre Road ARCHBOLD, OH 43502 Fulton County
Permit:	P0118046, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Fulton County Expositor on 02/10/2015. The comment period ended on 03/12/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

No Comments Received.

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Sauder Manufacturing

Facility ID:	0326000204
Permit Number:	P0118046
Permit Type:	Renewal
Issued:	3/16/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Sauder Manufacturing

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Authorization

Facility ID:	0326000204
Facility Description:	Wood Furniture Manufacturing
Application Number(s):	A0052232, A0052492
Permit Number:	P0118046
Permit Description:	Title V Renewal Permit for Wood Furniture Manufacturing Facility
Permit Type:	Renewal
Issue Date:	3/16/2015
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0087013

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Sauder Manufacturing
930 West Barre Road
ARCHBOLD, OH 43502

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b) 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 all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written 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.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met.

This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11)))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Northwest District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, 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.)

25. Records Retention RequirementsUnder State Law Only

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.

26. 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.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

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 Ohio EPA DAPC, Northwest District Office 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).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northwest District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit-to-install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31:

   B901 – SM #2 air makeup unit (5.78mmBtu natural gas fired);
   B902 – SM #3 air make up unit (5.78mmBtu natural gas fired);
   B903 – SM #4 air make up unit (5.78mmBtu natural gas fired);
   B904 – SM RFQ-01 air makeup unit (5.78 mmBtu natural gas fired);
   B905 – SM RFQ-02 air makeup unit (5.78mmBtu natural gas fired); and
   B906 – SM RFQ-03 air makeup unit (5.78mmBtu natural gas fired);

   [Authority for Term: OAC rule 3745-77-07(A)(13]

3. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subparts JJ, National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations: R600 Front Back Stain Booth (Application Area), R601 Front Back Sealer Booth, R602 Front Back Topcoat Booth and R603 Color Lab Spray Booth. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the appropriate Ohio EPA District office or local air agency.

   The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart JJ. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 1 of 40 CFR Part 63, Subpart JJ. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart JJ, and Subpart A.

   [Authority for term: 40 CFR Part 63, Subpart JJ]

4. The following insignificant emissions units are subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart JJ, in accordance with 40 CFR Parts 63.800 through 63.808 (including the Table(s) and Appendix(ices) referenced in Subpart JJ).

   P606 – Seat Upholstery Line
   P607 – Automatic Back Upholstery Line
   P608 – Kneeler Upholstery Line
   P609 – Laminating Line*

   *Emissions unit P609 does not employ any contact adhesives as defined in 40 CFR, Part 63.801. Therefore, emissions unit P609 is not subject to any of the VHAP emission limitations for contact adhesives contained in 40 CFR, Part 63.802(a)(2).

The permittee shall comply with the applicable restrictions required under 40 CFR Part 63, Subpart JJ, including the following sections:

63.802(a)	Emission Limits
63.803(c)	Operate to minimize emissions
63.803(a)	Work implementation plan
63.803(b)**	Operator training course
63.803(c)	Inspection and maintenance plan
63.803(d)	Cleaning and washoff solvent accounting system
63.803(e)	Chemical composition of cleaning and washoff solvents
63.803(f)	Spray booth cleaning
63.803(g)	Storage requirements
63.803(i)	Line cleaning
63.803(j)	Gun cleaning
63.803(k)	Washoff operations
63804(b)	An affected source subject to 63.802(a)(2)(i) shall comply with those provisions by using compliant foam adhesives with a VHAP of no greater than 1.8 lb VHAP/lb solids, as applied.
63.804(f)	Initial compliance
63.804(g)	Continuous compliance
63.805(a)	U.S. EPA Method 311 of Appendix A of 40 CFR, Part 63 shall be used in conjunction with the formulation data to determine the VHAP content of the liquid coating
63.806(a)	Recordkeeping requirements of 63.10 of Subpart A according to the applicability criteria in 63.800(d)
63.806(b)	Recordkeeping requirements for sources subject to emission limitations in 63.802
63.806(e)	Recordkeeping requirements for the work practice standards in 63.803
63.806(h)	Recordkeeping requirements for the compliance certifications submitted in accordance with 63.807(c) for sources subject to the emission limitations in 63.802 and following the compliance provisions of 63.804(f)(1), (2), (3), (5), (7) and (8) and 63.804(g)(1), (2), (3), (5), (7) and (8)
63.806(i)	Recordkeeping requirements of all other information submitted with the compliance status report required by 63.9(h) and 63.807(b)
63.806(j)	Recordkeeping requirements in accordance with 63.10(b)(1)
63.806(k)	Recordkeeping requirements in accordance with 63.802(c)
63.807(a)	Reporting requirements of 63.7 through 63.10 of Subpart A according to the applicability criteria in 63.800(d)
63.807(b)	Reporting requirements for sources demonstrating compliance in accordance with 63.804(f)(1), (2), (3), (5), (7) and (8)
63.807(c)	Reporting requirements for sources demonstrating compliance in accordance with 63.804(g)(1), (2), (3), (5), (7) and (8)
63.807(e)	Reporting requirements for sources required to provide a written notification under 63.803(l)(4)

** This rule is only applicable to coating application equipment operators applying HAP containing finishing materials or adhesives.

[Authority for term: 40 CFR Part 63, Subpart JJ]

C. Emissions Unit Terms and Conditions

1. P600, BAGHOUSE#1 SMC

Operations, Property and/or Equipment Description:

Pneumatic Wood Waste Handling System Consisting of Collection Points, Duct Work and a 60,000-acfm Baghouse (#1 ME 3675)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OACrule 3745-17-07(A)	None. [See b)(2)a.]
b.	OACrule 3745-17-11(B)	None. [See b)(2)b.]
c.	OAC rule 3745-31-05(A)(3) (PTI #P0118352, issued 1/29/15)	2.16 lbs of particulate emissions (PE)/hr, 9.46 TPY PE 1.54 lbs of particulate matter lessthan 10 microns (PM10)/hr, 6.75 TPY PM10 See b)(2)c. See b)(2)d.
d.	40 CFR Part 52.21 OAC rules 3745-31-10 through 20	0.0042 grain (gr) of PE/dry standard cubic feet (dscf), 0.0030 grPM10/dscf See b)(2)e.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

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

d. The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

e. The permittee shall employ Best Available Control Technology (BACT) on this emissions unit. BACT has been determined to be a baghouse and a maximum outlet concentration of 0.0042 grains PE/dscf and 0.0030 grains PM10/dscf from the wood waste handling system.

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI# P0118352]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)and PTI# P0118352]

f) Testing Requirements

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

a. Emissions Limitations: 0.0042 gr PE/dscf, 2.16 lbs PE/hr, 9.46 TPY PE

Applicable Compliance Method: The hourly limitation was established by multiplying the maximum outlet grain loading concentration of 0.0042 gr PE/dscf and the maximum volumetric air flow rate (60,000 acfm), and applying the conversion factors of 7000 gr/pound, 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the grain loading and the hourly emission limitations above by testing in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

Compliance with the annual emission limitation shall be determined by multiplying hourly PE limitation by the emissions unit's maximum operating schedule of 8760 hrs/yr, and then dividing by 2000. Therefore, as long as compliance with the hourly PE limitation is maintained, compliance with the annual PE limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 52.21, OAC rules 3745-31-10 through 20, and PTI# P0118352]

b. Emissions Limitations: 0.0030 gr/dscf, 1.54 lb PM10/hr, 6.75 TPY PM10

Applicable Compliance Method: The hourly limitation was established by multiplying the maximum outlet grain loading concentration of 0.0030 gr PM10/dscf and the maximum volumetric air flow rate (60,000 acfm), and applying the conversion factors of 7000 gr/pound, 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the grain loading and the hourly emission limitations above by testing in accordance with Methods 1-4 of of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

Compliance with the annual PM_{10} emission limitation shall be determined by multiplying hourly PM_{10} emission limitation by the emissions unit's maximum operating schedule of 8760 hrs/yr, and then dividing by 2000. Therefore, as long as compliance with the hourly PM_{10} emission limitation is maintained, compliance with the annual PM_{10} emission limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 52.21, OAC rules 3745-31-10 through 20, and PTI# P0118352]

c. Emissions Limitation: Visible PE from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity, as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance through visible emission observations performed in accordance with 40 CFR, Part 60, Appendix A, Method 9.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 52.21, OAC rules 3745-31-10 through 20, and PTI# P0118352]

g) Miscellaneous Requirements

(1) The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan shall clearly document how the permittee maintains the wood waste handling systems in good working order, i.e., the type of inspections done on the equipment as well as the frequency. The quality assurance/quality control plan and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan shall also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

[OAC rule 3745-77-07(C)(1) and PTI# P0118352]

2. P601, BAGHOUSE#2 SMC

Operations, Property and/or Equipment Description:

Pneumatic Wood Waste Handling System Consisting of Collection Points, Duct Work and a 60,000-acfm Baghouse (Baghouse #2 ME 3675A)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OACrule 3745-17-07(A)	None [See b)(2)a.]
b.	OACrule 3745-17-11(B)	None[See b)(2)b.]
c.	OAC rule 3745-31-05(A)(3) (PTI #P0118353, issued 1/29/15)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 2.16 lbs PE/hr, 9.46 TPY PE 0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 1.54 lb PM10/hr, 6.75 TPY PM10 See b)(2)c.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.

b. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.

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

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to eliminate the visible emissions.

[OAC rule 3745-77-07(C)(1) and PTI# P0118353]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

[OAC rule 3745-77-07(C)(1)and PTI# P0118353]

f) Testing Requirements

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

a. <u>Emissions Limitations:</u> 0.0042 gr PE/dscf, 2.16 lbs PE/hr, 9.46 TPY PE

<u>Applicable Compliance Method</u>: The hourly limitation was established by multiplying the maximum outlet grain loading concentration of 0.0042 gr PE/dscf and the maximum volumetric air flow rate (60,000 acfm), and applying the conversion factors of 7000 gr/pound, 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the grain loading and the hourly emission limitations above by testing in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

Compliance with the annual PE limitation shall be determined by multiplying hourly PE limitation by the emissions unit's maximum operating schedule of 8760 hrs/yr, and then dividing by 2000. Therefore, as long as compliance with the hourly PE limitation is maintained, compliance with the annual PE limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI# P0118353]

b. Emissions Limitations: 0.0030 gr/dscf, 1.54 lb PM10/hr, 6.75 TPY PM10

Applicable Compliance Method: The hourly limitation was established by multiplying the maximum outlet grain loading concentration of 0.0030 gr PM10/dscf and the maximum volumetric air flow rate (60,000 acfm), and applying the conversion factors of 7000 gr/pound, 60 minutes/hour.

If required, the permittee shall demonstrate compliance with the grain loading and the hourly emission limitations above by testing in accordance with Methods 1-4 of 40 CFR Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA.

Compliance with the annual PM_{10} emission limitation shall be determined by multiplying hourly PM_{10} emission limitation by the emissions unit's maximum operating schedule of 8760 hrs/yr, and then dividing by 2000. Therefore, as long as compliance with the hourly PM_{10} emission limitation is maintained, compliance with the annual PM_{10} emission limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI# P0118353]

c. Emissions Limitation: Visible PE from the baghouse associated with the pneumatic wood waste handling system shall not exceed 5% opacity, as a 6-minute average, except when the emissions unit is vented inside the building.

Applicable Compliance Method: If required, the permittee shall demonstrate compliance through visible emission observations performed in accordance with 40 CFR, Part 60, Appendix A, Method 9.

[OAC rule 3745-77-07(C)(1) and PTI# P0118353]

g) Miscellaneous Requirements

(1) The permittee shall maintain a preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan shall clearly document how the permittee maintains the wood waste handling systems in good

working order, i.e., the type of inspections done on the equipment as well as the frequency. The quality assurance/quality control plan and logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan shall also specify the responsible person(s) for notifying the Northwest District Office in the event of an equipment malfunction.

[OAC rule 3745-77-07(C)(1) and PTI# P0118353]

3. R600, FRONT BACK STAIN BOOTH (APPLICATION AREA) SMC

Operations, Property and/or Equipment Description:

Front/Back Stain Booth

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(C)	See c)(2), c)(3), d)(4) through d)(8), and e)(1)
b.	OAC rule 3745-31-05(A)(3) (PTI #03-13511, issued on 7/17/03)	39.95 lbs organic compounds (OC)/hr,from coating operations 500.0 lbs OC/month and 3.0 tons OC /yrfrom cleanup materials
c.	OAC rule 3745-31-05(D) (PTI #03-13511, issued on 7/17/03)	36.0 tons OC per rolling, 12-month periodfrom coating operations. See b)(2)a.
d.	40 CFR, Part 63, Subpart JJ (40 CFR 63.800 – 63.819) [In accordance with 40 CFR 63.802(a)(1), this emission unit is a finishing operation booth at an existing wood manufacturing operation subject to the emissions limitations and control measures specified in this section.]	<u>See Table 3 of 40CFR Part 63, Subpart JJ:</u>1.0 lb volatile hazardous air pollutant (VHAP)/lb solids, as applied, for stains 10% VHAP, by weight, for each thinner Work Practice Standards [40 CFR 63.803] [See b)(2)b.] See d)(3), e)(3) and f)(2).
e.	40 CFR 63.1-16	Table 1 to 40 CFR, Part 63, Subpart JJ – Applicability of General Provisions to Subpart JJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

Additional Terms and Conditions:

a. The permittee has requested federally enforceable emission limitations of 36.0 tons OC per rolling, 12-month period based on annual coating usage restrictions [See c)(1).]

b. The permittee shall comply with the applicable work practice standards required under 40 CFR, Part 63, Subpart JJ, including the following sections:

63.803(a)	Work implementation plan
63.803(c)	Operate to minimize emissions
63.803(b)*	Operator training course
63.803(c)	Inspection and maintenance plan
63.803(d)	Cleaning and washoff solvent accounting system
63.803(e)	Chemical composition of cleaning and washoff solvents
63.803(f)	Spray booth cleaning
63.803(g)	Storage requirements
63.803(h)	Application equipment requirements
63.803(i)	Line cleaning
63.803(j)	Gun cleaning
63.803(k)	Washoff operations
63.803(l)	Formulation assessment plan for finishing operations

* This rule is only applicable to coating application equipment operators applying HAP containing finishing materials or adhesives.

c) Operational Restrictions

(1) The maximum OC content of any coating employed in this emissions unit shall not exceed 7.37 lbs OC/gallon, on an "as applied" basis. The maximum annual coating usage rate for this emissions unit shall not exceed 9,770 gallons, based upon a rolling, 12-month summation of the coating usage rates.

[OAC rule 3745-77-07(A)(1) and PTI #03-13511]

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1), OAC rule 3745-17-11(C)(1) and (2)(b)]

(3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for coating usage in this emissions unit on an "as applied" basis:

a. a certified product data sheet for each stain (certified product data sheet defined in 40 CFR 63.801);

b. the company identification for each coating employed;

c. the number of gallons of each coating employed.;

d. the OC content, in pounds per gallon, for each coating employed;

e. the OC emission rate for each coating employed, in pounds per month

[d)(1)c. x d)(1)d.];

f. the total OC emission rate for all coatings employed [sum of d)(1)e. for all coating materials], in pounds or tons.; and

g. the annual OC emissions from all coating materials employed, based upon a rolling, 12-month summation of the monthly OC emissions, in tons.

[OAC rule 3745-77-07(C)(1) and PTI #03-13511]

(2) The permittee shall collect and record the following information each month for cleanup material* usage in this emissions unit:

a. the company identification of each cleanup material employed;

b. the number of gallons of each cleanup material employed;

c. the organic compound content, in pounds per gallon, for each cleanup materialemployed;

d. the organic compound emission rate for each cleanup material employed, in pounds per month [d)(2)b. x d)(2)c.];

e. the total organic compound emission rate** for all cleanup materials employed [sum of d)(2)d], in pounds or tons; and

f. the annual, year to date organic compound emissions from all cleanup materials employed [sum of d)(2)e. for each calendar month to date from January to December], in tons.

*Note: The permittee is only required to maintain records for cleanup materials that result in the emissions of OC.

**Note: The total OC emission rate for all the cleanup materials is presumed to be the same as the total OC input rate for all the cleanup materials.

[OAC rule 3745-77-07(C)(1) and PTI #03-13511]

(3) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart JJ, including the following sections:

63.806(a)	Recordkeeping requirements of 63.10 of Subpart A according to the applicability criteria in 63.800(d)
63.806(b)	Recordkeeping requirements for sources subject to emission limitations in 63.802
63.806(e)	Recordkeeping requirements for the work practice standards in 63.803
63.806(h)	Recordkeeping requirements for the compliance certifications submitted in accordance with 63.807(c) for sources subject to the emission limitations in 63.802 and following the compliance provisions of 63.804(f)(1), (2), (3), (5), (7) and (8) and 63.804(g)(1), (2), (3), (5), (7) and (8)
63.806(i)	Recordkeeping requirements of all other information submitted with the compliance status report required by 63.9(h) and 63.807(b)
63.806(j)	Recordkeeping requirements in accordance with 63.10(b)(1)

OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart JJ]

(4) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and OAC 3745-17-11(C)(2)(a)]

(5) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency, and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(c)]

(6) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(c)]

(7) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. The date of the inspection;

b. A description of each/any problem identified and the date it was corrected;

c. A description of any maintenance and repairs performed; and

d. The name of the person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. Any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C); and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit quarterly deviation reports, in accordance with the Standard Terms and Conditions of this permit, that include all exceedances of the rolling, 12-month organic compound emission limitations for the coating operations in section b)(1)f.

[OAC rule 3745-77-07(C)(1) and PTI #03-13511]

The permittee shall submit annual written reports of that include the actual annual OC emissions from cleanup materials usage. The reports shall be submitted to the Director by January 15 of each year and shall cover the previous calendar year. [OAC rule 3745-77-07(C)(1) and PTI #03-13511]

(3) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR, Part 63, Subpart JJ, including the following sections:

63.807(a)	Reporting requirements of 63.7 through 63.10 of Subpart A according to the applicability criteria in 63.800(d)
63.807(b)	Reporting requirements for sources demonstrating compliance in accordance with 63.804(f)(1), (2), (3), (5), (7) and (8)
63.807(c)	Reporting requirements for sources demonstrating compliance in accordance with 63.804(g)(1), (2), (3), (5), (7) and (8)
63.807(e)	Reporting requirements for sources required to provide a written notification under 63.803(l)(4)

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart JJ]

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of this permit shall be determined in accordance with the following methods:

a. Emission Limitations: 39.95 lbs OC/hour and 36.0 tons OC per rolling, 12-month period from coating operations.

Applicable Compliance Method :The hourly OC emission limitation is based on the emission unit's potential to emit*.Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance. Compliance with the annual emission limitation shall be determined based upon the record keeping requirementsspecified in section d)(1).

The rolling,12-month OC emission limitation was established by multiplying the annual gallon usage restriction by the maximum OC content of the coatings (7.37 pounds/gallon). Therefore, as long as compliance with the annual gallon usage restriction is maintained, compliance with the rolling, 12-month OC emission limitation shall be demonstrated.

*The potential to emit for this emissions unit was based on a maximum OC content of 7.37 pounds per gallon and a maximum hourly usage rate of 5.42 gallons per hour.

b. Emission Limitations:500.0 lbs OC/month and 3.0 tons OC/yr, from cleanup operations.

Applicable Compliance Method:Compliance with the OC emission limitations above shall be determined based upon the record keeping requirements specified in d)(2).

c. Emission Limitation:1.0 lb VHAP/lb solids, as applied, for stainsand 10% VHAP, by weight, for thinners.

Applicable Compliance Method: Compliance shall be determined based upon the record keeping requirements specified in section d)(3) and the procedures in f)(2).

[OAC rule 3745-77-07(C)(1) and PTI #03-13511]

(2) The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR, 63 Subpart JJ, including the following sections:

63.804(a)	An affected source subject to 63.802(a)(1) shall comply with those provisions by using any of the methods presented in 63.804(a)(1) through (a)(4)
63.804(f)	Initial compliance
63.804(g)	Continuous compliance demonstrations
63.805(a)	U.S. EPA Method 311 of Appendix A of 40 CFR, Part 63 shall be used in conjunction with the formulation data to determine the VHAP content of the liquid coating

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart JJ]

g) Miscellaneous Requirements

(1) None.

4. R601, FRONT BACK SEALER BOOTH SMC

Operations, Property and/or Equipment Description:

Front Back Sealer Booth, with Filters, Sauder Manufacturing Archbold, Plant Area I

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(C)	See c)(1), c)(2), d)(1) through d(5), and e)(1)
b.	40 CFR, Part 63, Subpart JJ (40 CFR 63.800 – 63.819) [In accordance with 40 CFR 63.802(a)(1), these emission units are finishing operation booths at an existing wood manufacturing operation subject to the emissions limitations and control measures specified in this section.]	<u>See Table 3 of 40 CFR, Part 63, Subpart JJ:</u> 1.0 lbs volatile hazardous air pollutant (VHAP)/lb solids, as applied, for sealers 10% VHAP, by weight, for each thinner Work Practice Standards [40 CFR 63.803] [See b)(2)a.] See d)(6), e)(2) and f)(2)
c.	40 CFR 63.1-16	Table 1 to 40 CFR, Part 63, Subpart JJ – Applicability of General Provisions to Subpart JJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable work practice standards required under 40 CFR, Part 63, Subpart JJ, including the following sections:

63.803(a)	Work implementation plan
63.803(c)	Operate to minimize emissions
63.803(b)*	Operator training course

63.803(c)	Inspection and maintenance plan
63.803(d)	Cleaning and washoff solvent accounting system
63.803(e)	Chemical composition of cleaning and washoff solvents
63.803(f)	Spray booth cleaning
63.803(g)	Storage requirements
63.803(h)	Application equipment requirements
63.803(i)	Line cleaning
63.803(j)	Gun cleaning
63.803(k)	Washoff operations
63.803(l)	Formulation assessment plan for finishing operations

* This rule is only applicable to coating application equipment operators applying HAP containing finishing materials or adhesives.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1), OAC rule 3745-17-11(C)(1) and (2)(b)]

(2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1), OAC rule 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and OAC 3745-17-11(C)(2)(a)]

(2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency, and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(c)]

(3) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(c)]

(4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. The date of the inspection;

b. A description of each/any problem identified and the date it was corrected;

c. A description of any maintenance and repairs performed; and

d. The name of the person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

(6) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart JJ, including the following sections:

63.806(a)	Recordkeeping requirements of 63.10 of Subpart A according to the applicability criteria in 63.800(d)
63.806(b)	Recordkeeping requirements for sources subject to emission limitations in 63.802
63.806(e)	Recordkeeping requirements for the work practice standards in 63.803
63.806(h)	Recordkeeping requirements for the compliance certifications submitted in accordance with 63.807(c) for sources subject to the emission limitations in 63.802 and following the compliance provisions of 63.804(f)(1), (2), (3), (5), (7) and (8) and 63.804(g)(1), (2), (3), (5), (7) and (8)
63.806(i)	Recordkeeping requirements of all other information submitted with the compliance status report required by 63.9(h) and 63.807(b)

63.806(j)	Recordkeeping requirements in accordance with 63.10(b)(1)

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart JJ]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. Any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C); and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR, Part 63, Subpart JJ, including the following sections:

63.807(a)	Reporting requirements of 63.7 through 63.10 of Subpart A according to the applicability criteria in 63.800(d)
63.807(b)	Reporting requirements for sources demonstrating compliance in accordance with 63.804(f)(1), (2), (3), (5), (7) and (8)
63.807(c)	Reporting requirements for sources demonstrating compliance in accordance with 63.804(g)(1), (2), (3), (5), (7) and (8)
63.807(e)	Reporting requirements for sources required to provide a written notification under 63.803(l)(4)

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart JJ]

f) Testing Requirements

(1) Compliance with the emissions limitations in section b)(1) of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u> 1.0 lbs VHAP/lb solids, as applied, for sealers and 10% VHAP, by weight, for thinners.

<u>Applicable Compliance Method:</u> The permittee shall demonstrate compliance with the VHAP emission limitations above based upon the record keeping requirements specified in section d)(6) and the compliance procedures and performance test methods specified in section f)(2) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart JJ]

(2) The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR, 63 Subpart JJ, including the following sections:

63.804(a)	An affected source subject to 63.802(a)(1) shall comply with those provisions by using any of the methods presented in 63.804(a)(1) through (a)(4)
63.804(f)	Initial compliance
63.804(g)	Continuous compliance demonstrations
63.805(a)	U.S. EPA Method 311 of Appendix A of 40 CFR, Part 63 shall be used in conjunction with the formulation data to determine the VHAP content of the liquid coating

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart JJ]

g) Miscellaneous Requirements

(1) None.

5. R602, FRONT BACK TOPCOAT BOOTH SMC

Operations, Property and/or Equipment Description:

Front Back Topcoat Booth with two filters, Topcoat Filter A connected to Stack A and Topcoat Filter B connected to Stack B, Sauder Manufacturing Archbold, Plant Area I

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(C)	See c)(1), c)(2), d)(1) through d)(5) and e)(1)
b.	40 CFR, Part 63, Subpart JJ (40 CFR 63.800 – 63.819) [In accordance with 40 CFR 63.802(a)(1), these emission units are finishing operation booths at an existing wood manufacturing operation subject to the emissions limitations and control measures specified in this section.]	<u>See Table 3 of 40 CFR, Part 63, Subpart JJ:</u> 1.0 pounds volatile hazardous air pollutant (lb VHAP)/lb solids, as applied, for topcoats. 10% VHAP, by weight, for each thinner Work Practice Standards [40 CFR 63.803] [See b)(2)a.] See d)(6), e)(2) and f)(2)
c.	40 CFR 63.1-16	Table 1 of 40 CFR, Part 63, Subpart JJ – Applicability of General Provisions to Subpart JJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable work practice standards required under 40 CFR, Part 63, Subpart JJ, including the following sections:

63.803(a)	Work implementation plan
63.803(c)	Operate to minimize emissions
63.803(b)*	Operator training course
63.803(c)	Inspection and maintenance plan
63.803(d)	Cleaning and washoff solvent accounting system
63.803(e)	Chemical composition of cleaning and washoff solvents
63.803(f)	Spray booth cleaning
63.803(g)	Storage requirements
63.803(h)	Application equipment requirements
63.803(i)	Line cleaning
63.803(j)	Gun cleaning
63.803(k)	Washoff operations
63.803(l)	Formulation assessment plan for finishing operations

* This rule is only applicable to coating application equipment operators applying HAP containing finishing materials or adhesives.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1), OAC rule 3745-17-11(C)(1) and (2)(b)]

(2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and OAC 3745-17-11(C)(2)(a)]

(2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency, and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(c)]

(3) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(c)]

(4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. The date of the inspection;

b. A description of each/any problem identified and the date it was corrected;

c. A description of any maintenance and repairs performed; and

d. The name of the person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

(6) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart JJ, including the following sections:

63.806(a)	Recordkeeping requirements of 63.10 of Subpart A according to the applicability criteria in 63.800(d)
63.806(b)	Recordkeeping requirements for sources subject to emission limitations in 63.802
63.806(e)	Recordkeeping requirements for the work practice standards in 63.803
63.806(h)	Recordkeeping requirements for the compliance certifications submitted in accordance with 63.807(c) for sources subject to the emission limitations in 63.802 and following the compliance provisions of 63.804(f)(1), (2), (3), (5), (7) and (8) and 63.804(g)(1), (2), (3), (5), (7) and (8)

63.806(i)	Recordkeeping requirements of all other information submitted with the compliance status report required by 63.9(h) and 63.807(b)
63.806(j)	Recordkeeping requirements in accordance with 63.10(b)(1)

OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart JJ]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. Any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a), OAC rule 3745-15-03(C); and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR, Part 63, Subpart JJ, including the following sections:

63.807(a)	Reporting requirements of 63.7 through 63.10 of Subpart A according to the applicability criteria in 63.800(d)
63.807(b)	Reporting requirements for sources demonstrating compliance in accordance with 63.804(f)(1), (2), (3), (5), (7) and (8)
63.807(c)	Reporting requirements for sources demonstrating compliance in accordance with 63.804(g)(1), (2), (3), (5), (7) and (8)
63.807(e)	Reporting requirements for sources required to provide a written notification under 63.803(l)(4)

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart JJ]

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u> 1.0 lbs VHAP/lb solids, as applied, for topcoats and 10% VHAP, by weight, for thinners.

<u>Applicable Compliance Method:</u> The permittee shall demonstrate compliance with the VHAP emission limitations above based upon the record keeping requirements specified in section d)(6) and the compliance procedures and performance test methods specified in section f)(2) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart JJ]

(2) The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR, 63 Subpart JJ, including the following sections:

63.804(a)	An affected source subject to 63.802(a)(1) shall comply with those provisions by using any of the methods presented in 63.804(a)(1) through (a)(4)
63.804(f)	Initial compliance
63.804(g)	Continuous compliance demonstrations
63.805(a)	U.S. EPA Method 311 of Appendix A of 40 CFR, Part 63 shall be used in conjunction with the formulation data to determine the VHAP content of the liquid coating

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart JJ]

g) Miscellaneous Requirements

(1) None.

6. R603, COLOR LAB SPRAY BOOTH (MANUAL SPRAY BOOTH) SMC

Operations, Property and/or Equipment Description:

Color Lab Spray Booth with paint filter connected to Stack R603, Sauder Manufacturing Archbold, Plant Area I

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(C)	See c)(1), c(2), d)(1) through d)(5) and e)(1)
b.	40 CFR, Part 63, Subpart JJ (40 CFR 63.800 – 63.819) [In accordance with 40 CFR 63.802(a)(1), these emission units are finishing operation booths at an existing wood manufacturing operation subject to the emissions limitations and control measures specified in this section.]	<u>See Table 3 of 40 CFR, Part 63, Subpart JJ:</u> 1.0 pounds volatile hazardous air pollutant (lb VHAP)/lb solids, as applied, for stains. 10% VHAP, by weight, for each thinner Work Practice Standards [40 CFR 63.803]. [See b)(2)a.] See d)(6), e)(2) and f)(2)
c.	40 CFR 63.1-16	Table 1 of 40 CFR, Part 63, Subpart JJ – Applicability of General Provisions to Subpart JJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. The permittee shall comply with the applicable work practice standards required under 40 CFR, Part 63, Subpart JJ, including the following sections:

63.803(a)	Work implementation plan
63.803(c)	Operate to minimize emissions
63.803(b)*	Operator training course
63.803(c)	Inspection and maintenance plan
63.803(d)	Cleaning and washoff solvent accounting system
63.803(e)	Chemical composition of cleaning and washoff solvents
63.803(f)	Spray booth cleaning
63.803(g)	Storage requirements
63.803(h)	Application equipment requirements
63.803(i)	Line cleaning
63.803(j)	Gun cleaning
63.803(k)	Washoff operations
63.803(l)	Formulation assessment plan for finishing operations

*This rule is only applicable to coating application equipment operators applying HAP containing finishing materials or adhesives.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-77-07(A)(1), OAC rule 3745-17-11(C)(1) and (2)(b)]

(2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(C)(2)(e)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-77-07(C)(1) and OAC 3745-17-11(C)(2)(a)]

(2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer, and the permittee shall maintain a

copy of the manufacturer's recommended inspection frequency, and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(c)]

(3) In addition to the recommended periodic inspections, not less than once each calendar year, the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(c)]

(4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. The date of the inspection;

b. A description of each/any problem identified and the date it was corrected;

c. A description of any maintenance and repairs performed; and

d. The name of the person who performed the inspection.

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

[OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-11(C)(2)(d) and (f)]

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

[OAC rule 3745-77-07(C)(1), OAC rule 3745-17-11(C)(2)(f) and (g) for OAC rule 3745-17-11(C)(1)]

(6) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR, Part 63, Subpart JJ, including the following sections:

63.806(a)	Recordkeeping requirements of 63.10 of Subpart A according to the applicability criteria in 63.800(d)
63.806(b)	Recordkeeping requirements for sources subject to emission limitations in 63.802
63.806(e)	Recordkeeping requirements for the work practice standards in 63.803
63.806(h)	Recordkeeping requirements for the compliance certifications submitted in accordance with 63.807(c) for sources subject to the emission

	limitations in 63.802 and following the compliance provisions of 63.804(f)(1), (2), (3), (5), (7) and (8) and 63.804(g)(1), (2), (3), (5), (7) and (8)
63.806(i)	Recordkeeping requirements of all other information submitted with the compliance status report required by 63.9(h) and 63.807(b)
63.806(j)	Recordkeeping requirements in accordance with 63.10(b)(1)

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart JJ]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. Any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation. The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C); and OAC rule 3745-77-07(C)(1)]

(2) The permittee shall submit semiannual reports and other such notifications and reports to the appropriate Ohio EPA District Office or local air agency as required pursuant to 40 CFR, Part 63, Subpart JJ, including the following sections:

63.807(a)	Reporting requirements of 63.7 through 63.10 of Subpart A according to the applicability criteria in 63.800(d)
63.807(b)	Reporting requirements for sources demonstrating compliance in accordance with 63.804(f)(1), (2), (3), (5), (7) and (8)
63.807(c)	Reporting requirements for sources demonstrating compliance in accordance with 63.804(g)(1), (2), (3), (5), (7) and (8)
63.807(e)	Reporting requirements for sources required to provide a written notification under 63.803(l)(4)

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart JJ]

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitation:</u> 1.0 lbs VHAP/lb solids, as applied, for stains and 10% VHAP, by weight, for thinners

<u>Applicable Compliance Method:</u> The permittee shall demonstrate compliance with the VHAP emission limitations abovebased upon the recordkeeping

requirements specified in section d)(6) and the compliance procedures and performance test methods specified in section f)(2) of the terms and conditions of this permit.

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart JJ]

(2) The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR, 63 Subpart JJ, including the following sections:

63.804(a)	An affected source subject to 63.802(a)(1) shall comply with those provisions by using any of the methods presented in 63.804(a)(1) through (a)(4)
63.804(f)	Initial compliance
63.804(g)	Continuous compliance demonstrations
63.805(a)	U.S. EPA Method 311 of Appendix A of 40 CFR, Part 63 shall be used in conjunction with the formulation data to determine the VHAP content of the liquid coating

[OAC rule 3745-77-07(C)(1) and 40 CFR, Part 63, Subpart JJ]

g) Miscellaneous Requirements

(1) None.