



State of Ohio Environmental Protection Agency

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

**CERTIFIED MAIL**

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 14-05454**

**DATE: 10/7/2003**

Bruewer Woodworking Mfg Co  
Ralph Bruewer  
10000 Cilley Road  
Cleves, OH 450029735

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

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

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

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

Sincerely,

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

cc: USEPA

HCDES



---

**Permit To Install  
Terms and Conditions**

**Issue Date: 10/7/2003  
Effective Date: 10/7/2003**

---

**FINAL PERMIT TO INSTALL 14-05454**

Application Number: 14-05454  
APS Premise Number: 1431473393  
Permit Fee: **\$800**  
Name of Facility: Bruewer Woodworking Mfg Co  
Person to Contact: Ralph Bruewer  
Address: 10000 Cilley Road  
Cleves, OH 450029735

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**10000 Cilley Road  
Cleves, Ohio**

Description of proposed emissions unit(s):  
**Modification of three PTIs for four wood furniture paint spray booths.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## **Part I - GENERAL TERMS AND CONDITIONS**

### **A. Permit to Install General Terms and Conditions**

#### **1. Compliance Requirements**

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

#### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

#### **3. Records Retention Requirements**

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

#### **4. Inspections and Information Requests**

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

representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**7. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

**8. Termination of Permit to Install**

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

**9. Construction of New Sources(s)**

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

**Bruewer Woodworking Mfg Co**  
**PTI Application: 14-05454**  
**Issued: 10/7/2003**

**Facility ID: 1431473393**

Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

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

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

**Brewer Woodworking Mfg Co**  
**PTI Application: 14-05454**  
**Issued: 10/7/2003**

**Facility ID: 1431473393**

**14. Construction Compliance Certification**

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

**15. Fees**

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

**B. Permit to Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	24.75
Single HAP's	9.9
Combined HAP's	24.9

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Wood Furniture Coating Line - Modification	OAC rule 3745-31-05(A)(3)	8 lbs VOC/hr, 40 lbs VOC/day, 7.3 tons VOC/yr
		See terms A.2.a. and A.2.b.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)(2) & (4)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(D)	24.9 TPY VOC from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility, based on a rolling, 12-month summation.
		See terms A.2.d. and A.2.e.

## 2. Additional Terms and Conditions

- 2.a The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 6.55 lbs/gallon, as applied.
- 2.b The volatile organic compound (VOC) content of each cleaning material employed in this emissions unit shall not exceed 7.91 lbs/gallon, as applied.
- 2.c Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations, emissions limitations and compliance with the Air Toxics Policy.
- 2.d The total allowable volatile organic compound (VOC) emissions from all the woodfinishing processes and associated cleaning, washoff and gluing processes located at this facility shall not exceed 24.9 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.
- 2.e The total allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

## B. Operational Restrictions

None

## C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information for each day for the coating operation:
  - a. The company identification for each coating and cleaning material employed;
  - b. The number of gallons of each coating and cleaning material employed;

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

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

The permittee has existing daily records to demonstrate compliance upon issuance of the permit.

2. The permittee shall collect and record the following information each month for emissions units R001, R002, R003 and R004, combined:
  - a. The name and identification number of each coating, cleaning, washoff and gluing material employed. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.
  - b. The volume, in gallons, of each coating, cleaning, washoff and gluing material employed.
  - c. The VOC content of each coating, cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied.
  - d. The amount of VOC emitted for all coating, cleaning, washoff and gluing materials employed, in pounds per month (b x c).
  - e. The rolling, 12-month\* usage for coating, cleaning, washoff and gluing materials, in gallons.
  - f. The rolling, 12-month\* VOC emission rate in tons per year ( in tons, rounded off to one

decimal place).

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

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

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

3. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from their date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.
4. The permit to install for this emissions unit R001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 8

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2310

MAGLC (ug/m3): 4,476

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
5. The permittee shall collect and record the following information each month for the entire facility:
- a. The name and identification number of each coating, employed;
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon

Emissions Unit ID: **R001**

- of coating, as applied [sum all the individual HAP contents from (b)];
- d. The number of gallons of each coating employed;
  - e. The name and identification of each cleaning material employed;
  - f. The individual HAP content for each HAP of each cleaning material, in pounds of individual HAP per gallon of cleaning material, as applied;
  - g. The total combined HAP content of each cleaning material in pounds of combined HAPs per gallon of cleaning material, as applied [sum all the individual HAP contents from (f)];
  - h. The number of gallons of each cleaning material employed;
  - i. The total individual HAP emissions for each HAP from all coatings and cleaning materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each cleanup material];
  - j. The total combined HAP emissions from all coatings and cleaning materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
  - k. The updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
  - l. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

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

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

**Bruewer Woodworking Mfg Co**

**PTI Application: 14-05454**

**Issued**

**Facility ID: 1431473393**

**Emissions Unit ID: R001**

2. The permittee shall submit quarterly reports which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY for each calendar month from emissions units R001, R002, R003 and R004, combined. These reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous calendar quarter. Exceeding the rolling, 12-month limit is a violation for each day of the last month of each 12 month period in which the limit is exceeded, regardless of whether a compliance plan is submitted.
3. The permittee shall submit deviation (excursion) reports which include the following information:
  - a. An identification of each hour during which the volatile organic compound emissions from the coatings and cleaning materials exceeded 8 pounds per hour, and the actual volatile organic compound emissions for each such hour.
  - b. An identification of each day during which the volatile organic compound emissions from the coatings and cleaning materials exceeded 40 pounds per day, and the actual volatile organic compound emissions for each such day.

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

4. If the facility (R001, R002, R003, and R004 ) has a rolling, 12 month record that exceeds 24.9 tons of VOC from combined operations associated with the manufacture of wood furniture, or wood furniture components, the permittee shall submit the following:
  - a. Within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Hamilton County Department of Environmental Services that the VOC emission limit was exceeded .
  - b. Within three months after the end of that rolling, 12-month period in which the exceedance occurred, a compliance plan to the Hamilton County Department of Environmental Services to comply with the presumptive RACT standards specified within USEPA document EPA-453/R-96-007 " Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations" (April 1996). Any divergence from the presumptive RACT standards and the model rule provided within that document shall be described at the time of the submittal of the 3-month compliance plan. Compliance with the presumptive RACT standards is to be achieved within 12 months after the rolling, 12-month period exceedance, unless otherwise requested by the permittee and approved by USEPA as a revision to Ohio's state implementation plan for ozone.
  - c. Exceeding the 24.9 TPY VOC limit is a violation for each day of the last month of each 12

**Bruewer Woodworking Mfg Co****PTI Application: 11-05454****Issued****Facility ID: 1431473393**Emissions Unit ID: **R001**

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

5. The permittee shall submit deviation reports which identify any exceedance of the HAP emission limitations set forth in this Permit to Install. If no exceedances occurred, the permittee shall state so in the report.
6. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
7. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

8 lbs VOC/hr, 40 lbs VOC/day, 7.3 tons VOC/yr for coatings and cleanup materials

Applicable Compliance Method:

Compliance with the hourly, daily and annual organic compound emission limitations shall be based upon the record keeping requirements specified in term C.1 of this permit.

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

$$\text{VOC content} * \text{material usage rate (gallons/yr)} / 2000 \text{ lbs} = \text{tons of VOC}$$

2. VOC Content Limitations:  
6.55 lbs/gallon for coatings  
7.91 lbs/gallon for cleaning materials

Applicable Compliance Method:

OAC rule 3745-21-10(B) shall be used to determine the density of the VOC contents of the coatings, cleaning materials, washoff materials, and gluing materials. If pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or Method 24A cannot be used, the permittee shall notify the Administrator of USEPA and shall use formulation data for the material to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

**Brewer Woodworking Mfg Co****PTI Application: 14-05454****Issued****Facility ID: 1431473393****Emissions Unit ID: R001**

3. Compliance with the emission limit of 24.9 TPY VOC from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility combined, based on a rolling 12-month summation shall be demonstrated by the recordkeeping requirements in term and condition C.2.
4. Compliance with the HAP emissions limitation in term A.2.e shall be determined by the record keeping in term C.5.

**F. Miscellaneous Requirements**

1. This Federally Enforceable Permit limits the potential emissions of volatile organic compounds from the wood furniture finishing processes and associated cleaning, washoff and gluing processes located at this facility to no more than 24.9 TPY during any rolling, 12-month period. Should VOC emissions from the wood finishing processes and associated cleaning, washoff and gluing processes exceed 24.9 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days. See term D.4.
2. The terms and conditions in this permit to install shall supersede permit to install 14-01910 issued November 14, 1991 for this emissions unit.
3. The following terms and conditions in this permit are federally enforceable: A, B, C.1 - C.3, C.5, D and E.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R002 - Wood Furniture Coating Line - Modification	OAC rule 3745-31-05(A)(3)	150 lbs VOC/day, from coatings only  See terms A.2.a., A.2.b., B.1 and B.2.
		17.45 TPY of VOC from emissions units R002, R003 and R004 combined.
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)	Exempt
	OAC rule 3745-31-05(D)	24.9 TPY VOC from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility, based on a rolling, 12-month summation.
		See terms A.2.d. and A.2.e.

**2. Additional Terms and Conditions**

- 2.a The volatile organic compound (VOC) content of each coating employed in emissions

units R002, R003 and R004 shall not exceed 6.0 lbs/gallon, as applied.

- 2.b** The volatile organic compound (VOC) content of each cleaning material employed in emissions units R002, R003 and R004 shall not exceed 6.57 lbs/gallon, as applied.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage and VOC content limitations, emissions limitations and compliance with the Air Toxics Policy.
- 2.d** The total allowable volatile organic compound (VOC) emissions from all the woodfinishing processes and associated cleaning, washoff and gluing processes located at this facility shall not exceed 24.9 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.
- 2.e** The total allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

## **B. Operational Restrictions**

1. The maximum coating usage for emissions unit R002 shall not exceed 25 gallons per day.
2. The maximum annual coating and cleaning material usage for emissions units R002, R003 and R004 combined shall not exceed 4367 gallons for coatings and 1324 gallons for cleaning materials, based on a rolling, 12-month summation of the usage figures.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

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

1. The permittee shall collect and record the following information for each day for the coating

operation:

- a. The company identification for each coating and cleaning material employed;
  - b. The number of gallons of each coating and cleaning material employed;
  - c. The volatile organic compound content of each coating and cleaning material, in pounds per gallon;
  - d. The total volatile organic compound emission rate for all coatings and cleaning materials, in pounds per day [the sum of (b x c) for each coating and cleanup material employed]; and
  - e. A record of each organic material employed in this emissions unit indicating whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month for emissions units R001, R002, R003 and R004, combined:
- a. The name and identification number of each coating, cleaning, washoff and gluing material employed. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.
  - b. The volume, in gallons, of each coating, cleaning, washoff and gluing material employed.
  - c. The VOC content of each coating, cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied.
  - d. The amount of VOC emitted for all coating, cleaning, washoff and gluing materials employed, in pounds per month (b x c).
  - e. The rolling, 12-month\* usage for coating, cleaning, washoff and gluing materials, in gallons.
  - f. The rolling, 12-month\* VOC emission rate in tons per year ( in tons, rounded off to one

decimal place).

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

- g. The rolling, 12-month\* usage for coating, cleaning, washoff and gluing materials, in gallons from emissions units R002, R003 and R004.
- h. The rolling, 12-month\* VOC emission rate in tons per year ( in tons, rounded off to one decimal place) from emissions units R002, R003 and R004.

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

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

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

- 3. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from their date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.
- 4. The permit to install for this emissions unit R002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 4.58

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1329

MAGLC (ug/m3): 4,476

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs

that show the results of the application of the "Air Toxic Policy" for the change.

5. The permittee shall collect and record the following information each month for the entire facility:
  - a. The name and identification number of each coating, employed;
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
  - d. The number of gallons of each coating employed;
  - e. The name and identification of each cleaning material employed;
  - f. The individual HAP content for each HAP of each cleaning material, in pounds of individual HAP per gallon of cleaning material, as applied;
  - g. The total combined HAP content of each cleaning material in pounds of combined HAPs per gallon of cleaning material, as applied [sum all the individual HAP contents from (f)];
  - h. The number of gallons of each cleaning material employed;
  - i. The total individual HAP emissions for each HAP from all coatings and cleaning materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each cleanup material];
  - j. The total combined HAP emissions from all coatings and cleaning materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
  - k. The updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
  - l. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

Emissions Unit ID: **R002**

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

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

1. The permittee shall submit quarterly reports which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY and the updated rolling, 12-month summation of the coating and cleaning material usages for each calendar month from emissions units R002, R003 and R004, combined. These reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous calendar quarter. Exceeding the rolling, 12-month limit is a violation for each day of the last month of each 12 month period in which the limit is exceeded, regardless of whether a compliance plan is submitted.
2. The permittee shall submit quarterly reports which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY for each calendar month from emissions units R001, R002, R003 and R004, combined. These reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous calendar quarter. Exceeding the rolling, 12-month limit is a violation for each day of the last month of each 12 month period in which the limit is exceeded, regardless of whether a compliance plan is submitted.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e VOC contents) and/or any exceedances of the 150 pounds per day VOC emission limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
5. If the facility (R001, R002, R003, and R004 ) has a rolling, 12 month record that exceeds 24.9 tons of VOC from combined operations associated with the manufacture of wood furniture, or wood furniture components, the permittee shall submit the following:
  - a. Within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Hamilton County Department of Environmental Services

that the VOC emission limit was exceeded .

- b. Within three months after the end of that rolling, 12-month period in which the exceedance occurred, a compliance plan to the Hamilton County Department of Environmental Services to comply with the presumptive RACT standards specified within USEPA document EPA-453/R-96-007 " Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations" (April 1996). Any divergence from the presumptive RACT standards and the model rule provided within that document shall be described at the time of the submittal of the 3-month compliance plan. Compliance with the presumptive RACT standards is to be achieved within 12 months after the rolling, 12-month period exceedance, unless otherwise requested by the permittee and approved by USEPA as a revision to Ohio's state implementation plan for ozone.
  - c. Exceeding the 24.9 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 24.9 TPY limit is exceeded , regardless of whether a compliance plan is submitted.
6. The permittee shall submit deviation reports which identify any exceedance of the HAP emission limitations set forth in this Permit to Install. If no exceedances occurred, the permittee shall state so in the report.
  7. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing any exceedance of the 25 gallons per day usage limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
  8. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
  9. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

150 lbs VOC/day, 17.45 tons VOC/yr for coatings and cleanup materials

**Bruewer Woodworking Mfg Co**  
**PTI Application: 14-05454**  
**Issued**

**Facility ID: 1431473393**

Emissions Unit ID: **R002**

Applicable Compliance Method:

Compliance with the daily and annual organic compound emission limitations shall be based upon the record keeping requirements specified in terms C.1 and C.2 of this permit.

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

VOC content \* material usage rate (gallons/yr) / 2000 lbs = tons of VOC

2. Usage Limitations:

25 gallons per day for coatings, 4367 gallons/yr for coatings and 1324 gallons/yr for cleaning materials

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in terms C.1 and C.2 of this permit.

3. VOC Content Limitations:

6.0 lbs/gallon for coatings  
 6.57 lbs/gallon for cleanup materials

Applicable Compliance Method:

OAC rule 3745-21-10(B) shall be used to determine the density of the VOC contents of the coatings, cleaning materials, washoff materials, and gluing materials. If pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or Method 24A cannot be used, the permittee shall notify the Administrator of USEPA and shall use formulation data for the material to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

4. Compliance with the HAP emissions limitation in term A.2.e shall be determined by the record keeping in term C.5.

5. Compliance with the emission limit of 24.9 TPY VOC from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility combined, based on a rolling 12-month summation shall be demonstrated by the recordkeeping requirements in term and condition C.2

**F. Miscellaneous Requirements**

1. The terms and conditions in this permit to install shall supersede permit to install 14-01910 issued November 14, 1991 for this emissions unit.

2. This Federally Enforceable Permit limits the potential emissions of volatile organic compounds from the wood furniture finishing processes and associated cleaning, washoff and gluing processes located at this facility to no more than 24.9 TPY during any rolling, 12-month period. Should VOC emissions from the wood finishing processes and associated cleaning, washoff and gluing processes exceed 24.9 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days. See term D.4.
3. The following terms and conditions in this permit are federally enforceable: A, B, C.1 - C.3, C.5, D and E.

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

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R003 - Wood Furniture Coating Line - Modification	OAC rule 3745-31-05(A)(3)	240 lbs VOC/day from coatings only  See terms A.2.a., A.2.b., B.1 and B.2.  17.45 TPY of VOC from emissions units R002, R003 and R004 combined.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)	Exempt
	OAC rule 3745-31-05(D)	24.9 TPY VOC from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility, based on a rolling, 12-month summation.  See terms A.2.d. and A.2.e.

**2. Additional Terms and Conditions**

Emissions Unit ID: **R003**

- 2.a The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 6.0 lbs/gallon, as applied.
- 2.b The volatile organic compound (VOC) content of each cleaning material employed in this emissions unit shall not exceed 6.57 lbs/gallon, as applied.
- 2.c Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage and VOC content limitations, emissions limitations and compliance with the Air Toxics Policy.
- 2.d The total allowable volatile organic compound (VOC) emissions from all the woodfinishing processes and associated cleaning, washoff and gluing processes located at this facility shall not exceed 24.9 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.
- 2.e The total allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

**B. Operational Restrictions**

- 1. The maximum coating usage for emissions unit R003 shall not exceed 40 gallons per day.
- 2. The maximum annual coating and cleaning material usage for emissions units R002, R003 and R004 combined shall not exceed 4367 gallons for coatings and 1324 gallons for cleaning materials, based on a rolling, 12-month summation of the usage figures.

The permittee has existing records to demonstrate compliance upon issuance of the permit.

- 3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

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

- 1. The permittee shall collect and record the following information for each day for the coating

operation:

- a. The company identification for each coating and cleaning material employed;
  - b. The number of gallons of each coating and cleaning material employed;
  - c. The volatile organic compound content of each coating and cleaning material, in pounds per gallon; and
  - d. The total volatile organic compound emission rate for all coatings and cleaning materials, in pounds per day [the sum of (b x c) for each coating and cleanup material employed].
  - e. A record of each organic material employed in this emissions unit indicating whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month for emissions units R001, R002, R003 and R004, combined:
- a. The name and identification number of each coating, cleaning, washoff and gluing material employed. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.
  - b. The volume, in gallons, of each coating, cleaning, washoff and gluing material employed.
  - c. The VOC content of each coating, cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied.
  - d. The amount of VOC emitted for all coating, cleaning, washoff and gluing materials employed, in pounds per month (b x c).
  - e. The rolling, 12-month\* usage for coating, cleaning, washoff and gluing materials, in gallons.
  - f. The rolling, 12-month\* VOC emission rate in tons per year ( in tons, rounded off to one

**Brewer Woodworking Mfg Co**  
**PTI Application: 14-05454**  
**Issued**

**Facility ID: 1431473393**

Emissions Unit ID: **R003**

decimal place).

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

- g. The rolling, 12-month\* usage for coating, cleaning, washoff and gluing materials, in gallons from emissions units R002, R003 and R004.

- h. The rolling, 12-month\* VOC emission rate in tons per year ( in tons, rounded off to one decimal place) from emissions units R002, R003 and R004.

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

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

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

3. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from their date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.
4. The permit to install for this emissions unit R003 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 4.58

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1329

MAGLC (ug/m3): 4,476

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

satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
  - b. documentation of it's evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
  - c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
5. The permittee shall collect and record the following information each month for the entire facility:
- a. The name and identification number of each coating, employed;

Emissions Unit ID: R003

- b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
- c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
- d. The number of gallons of each coating employed;
- e. The name and identification of each cleaning material employed;
- f. The individual HAP content for each HAP of each cleaning material in pounds of individual HAP per gallon of cleaning material, as applied;
- g. The total combined HAP content of each cleaning material in pounds of combined HAPs per gallon of cleaning material, as applied [sum all the individual HAP contents from (f)];
- h. The number of gallons of each cleaning material employed;
- i. The total individual HAP emissions for each HAP from all coatings and cleaning materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each cleanup material];
- j. The total combined HAP emissions from all coatings and cleaning materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
- k. The updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- l. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

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

1. The permittee shall submit quarterly reports which specify the updated rolling, 12-month

summation of volatile organic compound emissions in TPY and the updated rolling, 12-month summation of the coating and cleaning material usages for each calendar month from emissions units R002, R003 and R004, combined. These reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous calendar quarter. Exceeding the rolling, 12-month limit is a violation for each day of the last month of each 12 month period in which the limit is exceeded, regardless of whether a compliance plan is submitted.

2. The permittee shall submit quarterly reports which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY for each calendar month from emissions units R001, R002, R003 and R004, combined. These reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous calendar quarter. Exceeding the rolling, 12-month limit is a violation for each day of the last month of each 12 month period in which the limit is exceeded, regardless of whether a compliance plan is submitted.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e VOC contents) and/or any exceedances of the 240 pounds per day VOC emission limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
5. If the facility (R001, R002, R003, and R004 ) has a rolling, 12 month record that exceeds 24.9 tons of VOC from combined operations associated with the manufacture of wood furniture, or wood furniture components, the permittee shall submit the following:
  - a. Within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Hamilton County Department of Environmental Services that the VOC emission limit was exceeded .
  - b. Within three months after the end of that rolling, 12-month period in which the exceedance occurred, a compliance plan to the Hamilton County Department of Environmental Services to comply with the presumptive RACT standards specified within USEPA document EPA-453/R-96-007 " Control of Volatile Organic Compound

**Bruewer Woodworking Mfg Co****PTI Application: 14-05454****Issued****Facility ID: 1431473393****Emissions Unit ID: R003**

Emissions from Wood Furniture Manufacturing Operations" (April 1996). Any divergence from the presumptive RACT standards and the model rule provided within that document shall be described at the time of the submittal of the 3-month compliance plan. Compliance with the presumptive RACT standards is to be achieved within 12 months after the rolling, 12-month period exceedance, unless otherwise requested by the permittee and approved by USEPA as a revision to Ohio's state implementation plan for ozone.

- c. Exceeding the 24.9 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 24.9 TPY limit is exceeded , regardless of whether a compliance plan is submitted.
6. The permittee shall submit deviation reports which identify any exceedance of the HAP emission limitations set forth in this Permit to Install. If no exceedances occurred, the permittee shall state so in the report.
7. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing any exceedance of the 40 gallons per day usage limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
8. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
9. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

**Brewer Woodworking Mfg Co**

PTI Application: 14-05454

**Issued****Facility ID: 1431473393**Emissions Unit ID: **R003**

Emission Limitation:

240 lbs VOC/day, 17.45 tons VOC/yr for coatings and cleanup materials

Applicable Compliance Method:

Compliance with the daily and annual organic compound emission limitations shall be based upon the record keeping requirements specified in terms C.1 and C.2 of this permit.

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

$$\text{VOC content} * \text{material usage rate (gallons/yr)} / 2000 \text{ lbs} = \text{tons of VOC}$$

## 2. Usage Limitations:

40 gallons per day for coatings, 4367 gallons/yr for coatings and 1324 gallons/yr for cleaning materials

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in terms C.1 and C.2 of this permit.

## 3. VOC Content Limitations:

6.0 lbs/gallon for coatings

6.57 lbs/gallon for cleanup materials

Applicable Compliance Method:

OAC rule 3745-21-10(B) shall be used to determine the density of the VOC contents of the coatings, cleaning materials, washoff materials, and gluing materials. If pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or Method 24A cannot be used, the permittee shall notify the Administrator of USEPA and shall use formulation data for the material to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

## 4. Compliance with the HAP emissions limitation in term A.2.e shall be determined by the record keeping in term C.5.

## 5. Compliance with the emission limit of 24.9 TPY VOC from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility combined, based on a rolling 12-month summation shall be demonstrated by the recordkeeping requirements in term and condition C.2

**F. Miscellaneous Requirements**

36

**Bruew**

**PTI A**

**Issued: 10/7/2003**

Emissions Unit ID: **R003**

1. The terms and conditions in this permit to install shall supersede permit to install 14-02725 issued November 12, 1992 for this emissions unit.

2. This Federally Enforceable Permit limits the potential emissions of volatile organic compounds from the wood furniture finishing processes and associated cleaning, washoff and gluing processes located at this facility to no more than 24.9 TPY during any rolling, 12-month period. Should VOC emissions from the wood finishing processes and associated cleaning, washoff and gluing processes exceed 24.9 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days. See term D.4.
3. The following terms and conditions in this permit are federally enforceable: A, B, C.1 - C.3, C.5, D and E.

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

### A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R004 - Wood Furniture Coating Line - Modification	OAC rule 3745-31-05(A)(3)	360 lbs VOC/day from coatings only  See terms A.2.a., A.2.b., B.1 and B.2.  17.45 TPY VOC from emissions units R002, R003 and R004 combined.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
	OAC rule 3745-21-07(G)	Exempt
	OAC rule 3745-31-05(D)	24.9 TPY VOC from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility, based on a rolling, 12-month summation.  See terms A.2.d. and A.2.e.

### 2. Additional Terms and Conditions

- 2.a The volatile organic compound (VOC) content of each coating employed in this emissions

unit shall not exceed 6.0 lbs/gallon, as applied.

- 2.b** The volatile organic compound (VOC) content of each cleaning material employed in this emissions unit shall not exceed 6.57 lbs/gallon, as applied.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage and VOC content limitations, emissions limitations and compliance with the Air Toxics Policy.
- 2.d** The total allowable volatile organic compound (VOC) emissions from all the woodfinishing processes and associated cleaning, washoff and gluing processes located at this facility shall not exceed 24.9 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.
- 2.e** The total allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from this facility shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

## **B. Operational Restrictions**

- 1. The maximum coating usage for emissions unit R004 shall not exceed 60 gallons per day.
- 2. The maximum annual coating and cleaning material usage for emissions units R002, R003 and R004 combined shall not exceed 4367 gallons for coatings and 1324 gallons for cleaning materials, based on a rolling, 12-month summation of the usage figures.

The permittee has existing daily records to demonstrate compliance upon issuance of the permit.

- 3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

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

- 1. The permittee shall collect and record the following information for each day for the coating operation:

- a. The company identification for each coating and cleaning material employed.
  - b. The number of gallons of each coating and cleaning material employed.
  - c. The volatile organic compound content of each coating and cleaning material, in pounds per gallon.
  - d. The total volatile organic compound emission rate for all coatings and cleaning materials, in pounds per day [the sum of (b x c) for each coating and cleaning material employed].
  - e. A record of each organic material employed in this emissions unit indicating whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month for emissions units R001, R002, R003 and R004, combined:
- a. The name and identification number of each coating, cleaning, washoff and gluing material employed. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.
  - b. The volume, in gallons, of each coating, cleaning, washoff and gluing material employed.
  - c. The VOC content of each coating, cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied.
  - d. The amount of VOC emitted for all coating, cleaning, washoff and gluing materials employed, in pounds per month (b x c).
  - e. The rolling, 12-month\* usage for coating, cleaning, washoff and gluing materials, in gallons.
  - f. The rolling, 12-month\* VOC emission rate in tons per year ( in tons, rounded off to one decimal place).

**Bruewer Woodworking Mfg Co**  
**PTI Application: 11-05154**  
**Issued**

**Facility ID: 1431473393**

**Emissions Unit ID: R004**

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

- g. The rolling, 12-month\* usage for coating, cleaning, washoff and gluing materials, in gallons from emissions units R002, R003 and R004.
- h. The rolling, 12-month\* VOC emission rate in tons per year ( in tons, rounded off to one decimal place) from emissions units R002, R003 and R004.

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

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

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

- 3. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from their date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.
- 4. The permit to install for this emissions unit R004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 4.58

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1329

MAGLC (ug/m3): 4,476

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

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

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

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

5. The permittee shall collect and record the following information each month for the entire facility:
- a. The name and identification number of each coating, employed;
  - b. The individual Hazardous Air Pollutant (HAP) content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
  - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
  - d. The number of gallons of each coating employed;
  - e. The name and identification of each cleaning material employed;
  - f. The individual HAP content for each HAP of each cleaning material, in pounds of individual HAP per gallon of cleaning material, as applied;
  - g. The total combined HAP content of each cleaning material in pounds of combined HAPs per gallon of cleaning material, as applied [sum all the individual HAP contents from (f)];
  - h. The number of gallons of each cleaning material employed;
  - i. The total individual HAP emissions for each HAP from all coatings and cleaning materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating and the sum of (f) times (h) for each cleanup material];
  - j. The total combined HAP emissions from all coatings and cleaning materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleanup material];
  - k. The updated rolling, 12-month summation for each individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
  - l. The updated rolling, 12-month summation for total combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

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

1. The permittee shall submit quarterly reports which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY and the updated rolling, 12-month summation of the coating and cleaning material usages for each calendar month from emissions units R002, R003 and R004, combined. These reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous calendar quarter. Exceeding the rolling, 12-month limit is a violation for each day of the last month of each 12 month period in which the limit is exceeded, regardless of whether a compliance plan is submitted.
2. The permittee shall submit quarterly reports which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY for each calendar month from emissions units R001, R002, R003 and R004, combined. These reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous calendar quarter. Exceeding the rolling, 12-month limit is a violation for each day of the last month of each 12 month period in which the limit is exceeded, regardless of whether a compliance plan is submitted.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e VOC contents) and/or any exceedances of the 360 pounds per day VOC emission limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
5. If the facility (R001, R002, R003, and R004 ) has a rolling, 12 month record that exceeds 24.9 tons of VOC from combined operations associated with the manufacture of wood furniture, or wood furniture components, the permittee shall submit the following:
  - a. Within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Hamilton County Department of Environmental Services that the VOC emission limit was exceeded .

**Brewer Woodworking Mfg Co**  
**PTI Application: 14-05454**  
**Issued**

**Facility ID: 1431473393**

**Emissions Unit ID: R004**

- b. Within three months after the end of that rolling, 12-month period in which the exceedance occurred, a compliance plan to the Hamilton County Department of Environmental Services to comply with the presumptive RACT standards specified within USEPA document EPA-453/R-96-007 "Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations" (April 1996). Any divergence from the presumptive RACT standards and the model rule provided within that document shall be described at the time of the submittal of the 3-month compliance plan. Compliance with the presumptive RACT standards is to be achieved within 12 months after the rolling, 12-month period exceedance, unless otherwise requested by the permittee and approved by USEPA as a revision to Ohio's state implementation plan for ozone.
  - c. Exceeding the 24.9 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 24.9 TPY limit is exceeded, regardless of whether a compliance plan is submitted.
6. The permittee shall submit deviation reports which identify any exceedance of the HAP emission limitations set forth in this Permit to Install. If no exceedances occurred, the permittee shall state so in the report.
  7. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing any exceedance of the 60 gallons per day usage limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
  8. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
  9. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

#### **E. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitation:

360 lbs VOC/day, 17.45 tons VOC/yr for coatings and cleanup materials

Applicable Compliance Method:

Compliance with the daily and annual organic compound emission limitations shall be based upon

the record keeping requirements specified in terms C.1 and C.2 of this permit.

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

$$\text{VOC content} * \text{material usage rate (gallons/yr)} / 2000 \text{ lbs} = \text{tons of VOC}$$

2. Usage Limitations:  
60 gallons per day for coatings, 4367 gallons/yr for coatings and 1324 gallons/yr for cleaning materials

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in terms C.1 and C.2 of this permit.

3. VOC Content Limitations:  
6.0 lbs/gallon for coatings  
6.57 lbs/gallon for cleanup materials

Applicable Compliance Method:

OAC rule 3745-21-10(B) shall be used to determine the density of the VOC contents of the coatings, cleaning materials, washoff materials, and gluing materials. If pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or Method 24A cannot be used, the permittee shall notify the Administrator of USEPA and shall use formulation data for the material to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

4. Compliance with the HAP emissions limitation in term A.2.e shall be determined by the record keeping in term C.5.
5. Compliance with the emission limit of 24.9 TPY VOC from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility combined, based on a rolling 12-month summation shall be demonstrated by the recordkeeping requirements in term and condition C.2

## F. Miscellaneous Requirements

1. The terms and conditions in this permit to install shall supersede permit to install 14-05176 issued August 9, 2001 for this emissions unit.
2. This Federally Enforceable Permit limits the potential emissions of volatile organic compounds from the wood furniture finishing processes and associated cleaning, washoff and gluing processes located at this facility to no more than 24.9 TPY during any rolling, 12-month period. Should

**Brewer Woodworking Mfg Co**

**PTI Application: 14-05454**

**Issued**

**Facility ID: 1431473393**

Emissions Unit ID: **R004**

VOC emissions from the wood finishing processes and associated cleaning, washoff and gluing processes exceed 24.9 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days. See term D.4.

3. The following terms and conditions in this permit are federally enforceable: A, B, C.1 - C.3, C.5, D and E.