State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
HAMILTON COUNTY

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 14-05881
Fac ID: 1431473393

DATE: 12/7/2006

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

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **HCDES** **OH-KY-IN Reg Coun of Gov** **KY** **IN**

☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**

Permit To Install: 14-05881

A. Source Description

Bruewer Woodworking Manufacturing Co. has several wood furniture coating lines. Emissions unit R005 is a wood furniture coating line and will replace a currently permitted similar line R003.

B. Facility Emissions and Attainment Status

The facility is located in Hamilton County which is non-attainment for 8-hour ozone (VOC) and PM2.5.

C. Source Emissions

The new emissions unit will be included in a group annual VOC emission limitation to keep the facility from triggering the 25 TPY VOC threshold for Ohio's RACT rule for wood furniture coating. The facility wide HAP emissions are limited to 10 TPY for a single HAP and 25 TPY for the combined HAPs.

D. Conclusion

The emissions unit is a replacement unit for a currently permitted operation which is included in a synthetic minor permit for HAPs. Limiting the HAP emissions will keep the facility from triggering Title V permitting requirements and the Wood furniture surface coating MACT in 40 CFR Part 63 Subpart JJ.

DRAFT PERMIT TO INSTALL 14-05881

Application Number:	14-05881
Facility ID:	1431473393
Permit Fee:	**To be entered upon final issuance**
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):
wood furniture coating line.

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

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

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

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

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

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
VOC	13.08
HAPs	9.9/24.9

Issued: To be entered upon final issuance
PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emission 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 emission limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment - (R005) - wood furniture coating line

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 234.6 lbs of VOC/day from coatings only. See terms and conditions A.2.a, A.2.b, B.1 and B.2. VOC emissions shall not exceed 17.45 TPY of VOC from emissions units R002, R004 and R005 combined. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
OAC rule 3745-31-05(C) Synthetic minor to avoid Title V permitting, 40 CFR Part 63 Subpart JJ and OAC rule 3745-21-15	VOC emissions shall not exceed 24.9 TPY from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility, based on a rolling, 12-month summation. See terms and conditions 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 6.34 lbs/gallon, as applied.

2.b The volatile organic compound (VOC) content of each cleaning material employed in this emissions unit shall not exceed 0.0 pounds per gallon, as applied.

2.c Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage and VOC content limitations and emission limitations.

2.d The total allowable volatile organic compound (VOC) emissions from emissions units R001 (wood furniture coating line #1), R002 (wood furniture coating line #2), R004 (wood furniture coating line #4) and R005 (wood furniture coating line #5) 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.

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

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 emissions units R001 (wood furniture coating line #1), R002 (wood furniture coating line #2), R004 (wood furniture coating line #4) and R005 (wood furniture coating line #5) 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.

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

B. Operational Restrictions

1. The maximum coating usage for emissions unit R005 shall not exceed 37 gallons per day.

2. The maximum annual coating and cleaning material usage for emissions units R002, R004 and R005 combined shall not exceed 4125 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.

C. Monitoring and/or Recordkeeping Requirements

Emissions Unit ID: **R005**

1. The permittee shall collect and record the following information for each day for this emissions unit:

   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].

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

h. the rolling, 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place) from emissions units R002, R004 and R005; and

*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 permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.d:

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 calender 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 calender 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, R004 and R005, combined. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.) Exceeding the rolling, 12-month limitation is a violation for each day of the last month of each 12 month period in which the limitation is exceeded, regardless of whether a compliance plan is submitted.

Issued: To be entered upon final issuance

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, R004 and R005, combined. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.) Exceeding the rolling, 12-month emission limitation is a violation for each day of the last month of each 12 month period in which the emission limitation 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 236.4 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. If the facility (R001, R002, R004, and R005) has a rolling, 12 month record that exceeds 24.9 tons of VOC from combined operations associated with the manufacture of wood furniture, or wood furniture components, the permittee shall submit the following:

   a. Within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Hamilton County Department of Environmental Services that the VOC emission limitation was exceeded;

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

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

5. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.e. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)

6. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing any exceedance of the 37 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.

7. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

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

   Emission Limitations:

   234.6 lbs of VOC/day, 17.45 tons of VOC/yr for coatings and cleanup materials.

   Applicable Compliance Method:

   Compliance with the daily and annual volatile organic compound emission limitations shall be based upon the record keeping requirements specified in terms and conditions 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**.**

   Usage Limitations:

   37 gallons per day for coatings, 4125 gallons/yr for coatings, 1324 gallons/yr for cleanup materials.

Applicable Compliance Method:

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

VOC Content Limitation:

6.34 lbs/gallon for coatings

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.

2. Compliance with the HAP emission limitations in term A.2.e shall be determined by the record keeping in term and condition C.4.

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

F. Miscellaneous Requirements

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

2. This Federally Enforceable Permit emission limitations 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. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not

necessary because the increase in emissions due to the modification(s) to the emissions unit was less than 1 ton per year of each toxic pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices").

Bruewer Woodworking Mfg Co **Facility ID: 1431473393**
PTI Application: 14-05881
Issued: To be entered upon final issuance

Emissions Unit ID: **R005**

SIC CODE 2499 SCC CODE 4-02-019-01 Emissions unit ID R005
Emissions unit DESCRIPTION wood furniture coating line
DATE INSTALLED 2006
EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emission Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM_{10}					
Sulfur Dioxide					
Organic Compounds	primary non-attainment	6.22	9.70	12.68	13.08
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Usage limits, VOC content limits, HAPs and total VOC annual emission limitations.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____