Ohio Environmental Protection Agency

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

Certified Mail

1/5/2016

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Mr. KEITH MERRITT
MERRITT WOODWORK
7198 INDUSTRIAL PARK BLVD
MENTOR, OH 44060

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0243080784
Permit Number: P0120123
Permit Type: Renewal
County: Lake

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 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. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-NEDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
MERRITT WOODWORK

Facility ID:	0243080784
Permit Number:	P0120123
Permit Type:	Renewal
Issued:	1/5/2016
Effective:	1/5/2016
Expiration:	1/5/2021

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
MERRITT WOODWORK

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Authorization

Facility ID:	0243080784
Application Number(s):	A0055065, A0055066
Permit Number:	P0120123
Permit Description:	Renewal FEPTIO permit for coating lines and woodworking operations.
Permit Type:	Renewal
Permit Fee:	$0.00
Issue Date:	1/5/2016
Effective Date:	1/5/2016
Expiration Date:	1/5/2021

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

MERRITT WOODWORK
7198 INDUSTRIAL PARK BLVD
Mentor, OH 44060

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0120123
Permit Description: Renewal FEPTIO permit for coating lines and woodworking operations.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**P001**
Company Equipment ID:	Woodworking Operations (Bldg 7171)
Superseded Permit Number:	P0119766
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	Woodworking Operations (Bldg 7198)
Superseded Permit Number:	P0119766
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R002**
Company Equipment ID:	JBI Paint Spray Booth (Building 7198)
Superseded Permit Number:	P0119766
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R003**
Company Equipment ID:	Cefla Auto Spray Booth (Bldg 7171)
Superseded Permit Number:	P0119766
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R004**
Company Equipment ID:	JBI Paint Spray Booth (Building 7171)
Superseded Permit Number:	P0119766
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R005**
Company Equipment ID:	Col-Met #1 Spray Booth (Bldg. 7171)
Superseded Permit Number:	P0119766
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R006**
Company Equipment ID:	Col-Met #2 Spray Booth (Bldg..7171)
Superseded Permit Number:	P0119766
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**R007**
Company Equipment ID:	Col-Met Bench-Style Booth (Bldg..7171)
Superseded Permit Number:	P0119766
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee.This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee.Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Woodwork Coating Operations: R002, R003, R004, R005, R006, R007

EU ID	Operations, Property and/or Equipment Description
R002	JBI Paint Spray Booth for wood furniture finshing operations in Bldg 7198.
R003	Cefla Auto Spray Booth for wood furniture finishing in Bldg 7171.
R004	JBI Paint Spray Booth for wood furniture finishing in Bldg 7171.
R005	Spray booth for custom wood furniture finishing.
R006	Spray booth for custom wood furniture finishing.
R007	Spray booth for custom wood furniture finishing.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(10), d)(11), d)(12) and d)(13) and e)(2).

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)a., b)(2)a., b)(2)b., b)(2)c., c)(2), d)(4), e)(3), e)(4), f)(1)a., f)(1)c. and f)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D)	See b)(2)a., b)(2)b. and b)(2)c.
b.	OAC rule 3745-31-05(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D). VOC emissions shall not exceed 12.0 pounds per hour for emissions units R002, R003 and R004, 14.72 pounds per hour for emissions units R005 and R006 and 41.4 pounds per hour for emissions unit R007. These emissions limitations are based upon the maximum coating application

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rate of 2.0 gallons per hour for R002, R003, R004, R005 and R006 and 5.6 gallons per hour for R007.
c.	OAC rule 3745-21-15(A)(2)	Exempted from the requirements of this rule because the facility potential to emit for volatile organic compound (VOC) emissions is limited to less than 25 tons per year by this permit. See b)(2)a.
d.	OAC rule 3745-17-11(C)	These surface coating operations shall be controlled by dry particulate filters, water washes or equivalent control device or devices. See c)(1).
e.	ORC 3704.03(F)(4)(c) and OAC rule 3745-114-01	See d)(10), d)(11), d)(12), d)(13) and e)(2).

(2) Additional Terms and Conditions

a. The VOC emissions from all coatings and cleanup materials employed in emissions units R002, R003, R004, R005, R006 and R007, combined, shall not exceed 24.9 tons per rolling, 12-month period. This limit is established to limit facility-wide OC emissions to less than the major source status threshold and to avoid the requirements of OAC rule 3745-21-15.

b. The HAP emissions from all coatings and cleanup materials employed in emissions units R002, R003, R004, R005, R006 and R007, combined, shall not exceed 9.9 tons per rolling, 12-month period for any individual HAP and 24.9 tons per rolling, 12-month period for total combined HAPs. These emission limitations are established to limit facility-wide HAPs emissions to less than major source thresholds and to avoid the requirements of 40 CFR Part 63, Subpart JJ – the MACT Standard for Wood Furniture Manufacturing Operations.

c. The combined coatings usage of emissions units R002, R003, R004, R005, R006 and R007 shall not exceed 8,736.8 gallons per rolling, 12-month period.

c) Operational Restrictions

(1) All exhaust from the spray booths shall pass through the filters whenever these emissions units are in operation.

(2) The VOC emissions from all coatings and cleanup material employed in emissions units R002, R003, R004, R005, R006 and R007, combined, shall not exceed 24.9 tons per rolling, 12-month period. The permittee has existing coating and cleanup material usage records such that there is no need for first year monthly VOC emission limitations.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the corresponding emissions unit was in operation.

(2) The permittee shall collect and record the following information for each day that coatings or cleanup materials are employed in each emissions unit:

a. the company identification for each coating or cleanup material employed;

b. the VOC content of each coating, in lbs/gallon as applied;

c. the number of gallons of each coating employed minus the number of gallons of coating recovered for disposal;

d. the total VOC emissions from all coatings employed, in lbs/day, i.e. sum of (b) times (c);

e. the total number of hours the emissions unit was in operation; and

f. the average hourly VOC emission rate for all coatings, i.e. (d)/(e), in lbs/hr.

(3) The permittee shall collect and record the following information for each month for each emissions unit:

a. the number of gallons of each cleanup material employed minus the number of gallons of cleanup material recovered for disposal;

b. the VOC content of each cleanup material, in lbs/gallon;

c. the total VOC emissions from all cleanup materials employed, in lbs/month, i.e. the sum of (b) times (a);

d. the actual VOC emissions from all coatings and cleanup materials for the previous, 12-month period [i.e., sum of the daily VOC emissions in term d)(2)d. and the monthly cleanup material VOC emissions in term d)(3)c. for the previous, 12-month period];

e. the actual VOC emissions from emissions units R002, R003, R004, R005, R006 and R007, combined, for the previous 12-month period; and

f. the number of gallons of all coatings employed in units R002, R003, R004, R005, R006 and R007, combined, for the previous 12-month period.

(4) The permittee shall collect and record the following information each month for all materials containing any hazardous air pollutant (HAP)[1] that are applied in emissions units R002, R003, R004, R005, R006 and R007, combined:

a. the name and identification number/code of each coating, thinner, additive, cleanup material, and any other material containing any HAP;

b. the name/identification of each individual HAP contained in each material applied (and identified in "a" above) and the pound(s) of each HAP per gallon of each HAP-containing material applied;

c. the number of gallons of each coating, thinner additive, cleanup material, and other material applied during the month;

d. for each individual HAP, the total emissions from all the materials employed, in ton(s), i.e., for each individual HAP, the summation of the products of "b" times "c" for all the materials applied during the month, divided by 2,000 pounds;

e. the total combined HAPs emissions from all the materials employed during the month, in ton(s), i.e., the summation of all the individual HAPs emissions from "d" above;

f. for each individual HAP, the total emissions during the rolling, 12-month period, i.e., the summation of the individual HAP emissions, as recorded in "d" above, for the present month plus the previous 11 months of operation, in ton(s); and

g. the total combined HAP emissions during the rolling, 12-month period, i.e., the summation of all HAP emissions, as recorded in "e" above, for the present month plus the previous 11 months of operation, in ton(s).

[(1)]Note: 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 District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings and cleanup materials.

(5) The permittee shall maintain documentation of the manufacturer's recommendations, instructions or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.

(6) The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions or operating manuals with any modifications deemed necessary by the permittee.

(7) The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

(8) The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.

(9) In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

(10) The FEPTIO applications for these emissions unit(s), R002, R003, R004, R005, R006 and R007 were evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., 24.hours per day and 7 days per week, from that of 8 hours per day and 5 days per week. The resulting

calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m3): 75.34

Maximum Hourly Emission Rate (lbs/hr): 4.95

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 281.2

Adjusted MAGLC (ug/m3): 1,793.8

The permittee, has demonstrated that emissions of air toxic contaminants, from emissions units R002, R003, R004, R005 and R006 are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

e. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene

TLV (mg/m3): 75.34

Maximum Hourly Emission Rate (lbs/hr): 13.88

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1,612

Adjusted MAGLC (ug/m3): 1,793.8

The permittee, having demonstrated that emissions of toluene, from emissions unit R007, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit(s) at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(11) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the

predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(12) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination

that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(13) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(2) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. any exceedance of the annual VOC* emission limitation of 24.9 tons per rolling, 12-month period from emissions units R002, R003, R004, R005, R006 and R007, combined, and the actual VOC emissions during each such period;

*based upon the premise that 100% of the solvent in the coating and clean up material employed is emitted.

ii. any exceedance of the rolling, 12-month limitation on combined coatings usage by emissions units R002, R003, R004, R005, R006 and R007, and the actual number of gallons of coating employed;

iii. each day during which the average VOC emissions from the coatings exceeded 12.0 pounds per hour for R002, R003 or R004, 14.72 pounds per hour for R005 or R006 and/or 41.4 pounds per hour for R007, and the actual average VOC emissions for each such day.

iv. each day during which the coating application rate exceeded 2.0 gallons per hour for R002, R003, R004, R005 or R006 and/or 5.6 gallons per hour for R007, and the actual average hourly coating usage for each such day.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the Ohio EPA Northeast District Office).

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

a. all exceedances of the rolling, 12-month individual HAP emission limitation for each HAP for all the coatings, thinners, additives, and cleanup materials employed; and

b. all exceedances of the rolling, 12-month total combined HAPs emission limitation for all the coatings, thinners, additives, and cleanup materials employed.

f) Testing Requirements

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

a. <u>Emission Limitation</u>:

The VOC emissions from all coatings and cleanup materials employed in emissions units R002, R003, R004, R005, R006 and R007, combined, shall not exceed 24.9 tons per rolling, 12-month period.

<u>Applicable Compliance Method</u>:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(2) and d)(3) for emissions units R002, R003, R004, R005, R006 and R007, combined.

b. Emission Limitation:

VOC emissions from coatings shall not exceed 12.0 pounds per hour for R002, R003 and R004, 14.72 pounds per hour for R005 and R006 and 41.4 pounds per hour for R007.

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in d)(2)f. based on the record keeping requirements specified in d)(2).

c. Emission Limitation:

The HAP emissions from all coatings and cleanup materials employed in emissions units R002, R003, R004, R005, R006 and R007, combined, shall not exceed 9.9 tons per rolling, 12-month period for any individual HAP.

Applicable Compliance Method:

Compliance shall be demonstrated by the monthly values calculated in d)(4)f. based on the record keeping requirements specified in d)(4).

d. Emission Limitation:

The HAP emissions from all coatings and cleanup materials employed in emissions units R002, R003, R004, R005, R006 and R007, combined, shall not exceed 24.9 tons per rolling, 12-month period for all total combined HAPs.

Applicable Compliance Method:

Compliance shall be demonstrated by the monthly values calculated in d)(4)g. based on the record keeping requirements specified in d)(4).

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -Woodworking Operations: P001, P002

EU ID	Operations, Property and/or Equipment Description
P001	Custom wood furniture shop in Bldg 7171, w/4,500 acfmbaghouse.
P002	Custom wood furniture shop in Bldg 7198, w/20,000 acfmbaghouse.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)(1)	The requirements of this rule are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).
b.	OAC rule 3745-17-07(A)(1)	Visible PE from the baghouse exhaust stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001.	PE emissions shall not exceed 1.16 pounds per hour and 5.07 tons per year for P001 and 5.14 pounds per hour and 22.53 tons per year for P002. See b)(2)a. and b)(2)b.

(2) Additional Terms and Conditions

a. These emissions units were installed prior to August 3, 2006, and are therefore not subject to a case-by-case Best Available Technology (BAT) determination in accordance with Ohio EPA past practices that pre-dated Senate Bill 265.

b. The emissions from these emissions units shall be vented to a baghouse at all times the emissions units are in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 1.0 to 8.0 inches of water.

This range of the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA Northeast District Office. The permittee may request revisions to the range for the pressure drop based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(2) Currently the baghouse dust collector serving this emissions unit is exhausted indoors. Should that change in the future and the exhaust is vented to the outdoors, the following condition shall be applicable:

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

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

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

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

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

f. If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to

operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(2) The permittee shall identify in the annual permit evaluation report the following information concerning the operations of the baghouse during the 12-month reporting period for this/these emissions unit(s):

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

(3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(2) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

c. This report shall only be required if the baghouse exhaust is vented to the outdoors.

f) Testing Requirements

(1) Emission Limitation:

Visible PE from the baghouse exhaust stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated upon visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

This test method shall only apply if the baghouse exhaust is vented to the outdoors.

(2) Compliance with the emission limitations in b)(1) above shall be determined in accordance with the following methods:

a. Emission Limitation:

1.16 lb of PE/hour for P001.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the PE outlet grain loading emissions factor of 0.03 gr/dscf by the baghouse exhaust flow rate of 4,500 dscfm and 60 minutes per hour, then dividing by the conversion factor of 7,000 grains/lb.

b. Emission Limitation:

5.14 lbs of PE/hour for P002.

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the PE outlet grain loading emissions factor of 0.03 gr/dscf by the baghouse exhaust flow rate of 20,000 dscfm and 60 minutes per hour, then dividing by the conversion factor of 7,000 grains/lb.

c. Emission Limitation:

5.07 TPY of PE for P001.

Applicable Compliance Method:

Compliance with the annual PE limit shall be determined by multiplying the actual annual operating hours, as determined by the record keeping specified in d)(1) by the hourly PE limit (1.16 lb/hr) and the conversion factor 1.0 ton/2,000 lbs.

d. Emission Limitation:

22.53 TPY of PE for P002.

Applicable Compliance Method:

Compliance with the annual PE limit shall be determined by multiplying the actual annual operating hours, as determined by the record keeping specified in d)(1) by the hourly PE limit (5.14 lbs/hr) and the conversion factor 1.0 ton/2,000 lbs.

g) Miscellaneous Requirements

(1) None.