

Facility ID: 1318128365 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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[Go to Part II for Emissions Unit P001](#)

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Facility ID: 1318128365 Emissions Unit ID: K001 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
K001 - binks spray booth; coating wood parts	OAC rule 3745-31-05(A)(3) (Permit-to-Install No. 13-04128 issued on 2/5/2004) OAC rule 3745-21-07(G)(2) 40 CFR 63 Subpart JJ	6.94 lbs VOC/hour and 13.88 lbs VOC/day and 2.53 tons VOC/year The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3). See A.2.a.

2. Additional Terms and Conditions

- (a) The permittee shall meet the following of 40 CFR part 63 Subpart JJ:
 - i. use less than 5 tons per each rolling 12-month period of each hazardous air pollutant (HAP) at the facility, including materials used for source categories other than wood furniture;
 - ii. use less than 12.5 tons per each rolling 12-month period of the combination of all HAPs at the facility, including material used for source categories other than wood furniture; and
 - iii. ensure that at least 90 percent of the plantwide HAP emissions per each rolling 12-month period is associated with the manufacture of wood furniture or wood furniture components.

The permittee shall include any HAP emissions generated by all other emissions units at the facility in determining compliance with the above-mentioned limitations.

B. Operational Restrictions

1. The permittee shall utilize a dry filter at all times the emissions unit is in operation.

C. Monitoring and/or Record Keeping 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;
 - b. the number of gallons of each coating;
 - c. the OC content of each coating, in lbs/gallon of OC; and
 - d. the total emission rate for all coatings, in lbs/day of OC (summation of b x c for all coatings employed).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]
2. The permittee shall collect and record the following information each month for all emissions units:
 - a. an identification of each coating;
 - b. the number of gallons of each coating;

- c. the single HAP content of each coating, in lbs/gallon;
 - d. the combined HAPs content of each coating, in lbs/gallon;
 - e. the emissions of each single HAP from each coating, in lbs;
 - f. the total emissions of each single HAP from all coatings, in lbs;
 - g. the emissions of combined HAPs from each coating, in lbs; and
 - h. the total emissions of combined HAPs from all coatings, in lbs.
3. The permittee shall collect and record the following information each month for all emissions units:
- a. the rolling 12-month emissions of each single HAP; and
 - b. the rolling 12-month emissions of the combined HAPs.
- D. Reporting Requirements**
1. The permittee shall notify the Cleveland Division of Air Quality (CDAQ) in writing for the identification of each rolling 12-month period during which any single HAP emissions from all emissions units exceeded 5 tons, and the actual single HAP emissions for each such rolling 12-month period. The report shall be submitted within 30 days after the exceedance occurs.
 2. The permittee shall notify CDAQ in writing for the identification of each rolling 12-month period during which any combined HAP emissions from all emissions units exceeded 12.5 tons, and the actual combined HAP emissions for each such rolling 12-month period. The report shall be submitted within 30 days after the exceedance occurs.
 3. The permittee shall submit annual written reports to CDAQ which summarize the total emissions of each single HAP and of all combined HAPs for all emissions units for the previous calendar year. The reports shall include the emissions calculations and shall be submitted by January 31 of each year.
 4. The permittee shall submit quarterly written deviation (excursion) reports to CDAQ which identify days when the emissions unit exceeded the lbs VOC/day allowable limit. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- E. Testing Requirements**
1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:
Emission Limitation:
6.94 lbs/hour of VOC emissions

Applicable Compliance Method:
Compliance with the hourly emission limitation shall be determined by this one time calculation for the potential to emit:

 $(5.55 \text{ lbs VOC/gal})(2.5 \text{ gal/day})(1 \text{ day}/2 \text{ hours}) = 6.94 \text{ lbs VOC/hour}$
Emission Limitation:
13.88 lbs/day of VOC emissions

Applicable Compliance Method:
Compliance with the daily emission limitation shall be determined based upon the record keeping requirements specified in Section C.1.
Emission Limitation:
2.53 tons/yr of VOC emissions

Applicable Compliance Method:
The ton per year limitation was developed by multiplying the pound per day limitation by the maximum operating schedule of 365 days per year, and dividing by 2000 pounds per ton. Therefore, provided compliance is shown with the daily limitation, compliance will also be shown with the annual limitation.
Emission Limitation:
Less than 5 tons per each rolling 12-month period for each HAP at the facility.

Applicable Compliance Method:
Compliance with the above limit shall be determined based upon the record keeping requirements specified in Section C.2 and C.3.
Emission Limitation:
Less than 12.5 tons per each rolling 12-month period of combined HAPs at the facility.

Applicable Compliance Method:
Compliance with above limit shall be determined based upon the record keeping requirements specified in Section C.2 and C.3.
- F. Miscellaneous Requirements**
1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Part II - Special Terms and Conditions

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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.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
P001 - pneumatic (11,000 acfm) wood waste handling system for cutting, sawing, and shaping of wood parts	OAC rule 3745-31-05 (A)(3) (Permit-to-Install No. 13-04128 issued on 2/5/2004)	0.01 gr/dscf, 0.94 lbs PE/PM10/hour, and 4.12 tons PE/PM10 per year
	OAC rule 3745-17-07(A)	Opacity restriction (see A.2.a) The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11	The particulate emission limitation specified by this rule is less stringent than the particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. **Additional Terms and Conditions**
 - (a) Visible particulate emissions from the pneumatic wood waste handling system shall not exceed 5% opacity as a 6-minute average.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to eliminate the visible emissions.

D. Reporting Requirements

1. The permittee shall submit the deviation (excursion) reports in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse serving this emissions unit, and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland Division of Air Quality (CDAQ) by January 31 and July 31 of each year and shall cover the previous 6-month period.

E. Testing Requirements

1. Compliance with the emissions limitations in section A.1. of the terms and conditions of this permit shall be determined in accordance with the following methods:
Emissions Limitation:

0.01 gr/dscf and 0.94 lb PE/PM10 hr

Applicable Compliance Method:

Compliance with the lbs/hr limit may be determined by multiplying the maximum outlet concentration of 0.01 gr/dscf by the maximum volumetric air flow (11,000 acfm), and the appropriate conversion factors of 1 dscf/1 acf, 60 minutes/hr, and divide by 7000 grains/lb. PE is assumed to be equivalent to PM10. If required, compliance shall be determined by performing a stack test using Methods 1 - 5 of 40 CFR Part 60, Appendix A.

Emissions Limitation:

4.12 TPY PE/PM10

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8760 hours of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

Emissions Limitation:

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

Applicable Compliance Method:

If required, visible emissions observations shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

1. None