



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

07/24/02

**CERTIFIED MAIL**

**RE: Final Title V Chapter 3745-77 permit**

03-26-00-0160

Sauder Woodworking  
JOHN D SCHLATTER  
502 MIDDLE STREET  
ARCHBOLD, OH 43502

Dear JOHN D SCHLATTER:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street  
Room 300  
Columbus, Ohio 43215

If you have any questions, please contact Northwest District Office.

Very truly yours,

Thomas G. Rigo, Manager  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: Northwest District Office  
File, DAPC PMU



State of Ohio Environmental Protection Agency

**FINAL TITLE V PERMIT**

Issue Date: <b>07/24/02</b>	Effective Date: <b>07/24/02</b>	Expiration Date: <b>07/24/07</b>
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This document constitutes issuance of a Title V permit for Facility ID: 03-26-00-0160 to:

Sauder Woodworking  
502 MIDDLE STREET  
ARCHBOLD, OH 43502

**Emissions Unit ID (Company ID)/Emissions Unit Activity Description**

P600 (BAGHOUSE#1 SMC) SAUDER MANUFACTURING ARCHBOLD PLANT AREA I	R601 (FRONT BACK SEALER BOOTH SMC) SAUDER MANUFACTURING ARCHBOLD PLANT AREA I	R604 (CLEARCOAT SPRAY UNIT FOR A MOULDING FINISHING LINE SMC) SAUDER MANUFACTURING ARCHBOLD PLANT AREA I
P601 (BAGHOUSE#2 SMC) SAUDER MANUFACTURING ARCHBOLD PLANT AREA I	R602 (FRONT BACK TOPCOAT BOOTH SMC) SAUDER MANUFACTURING ARCHBOLD PLANT AREA I	R605 (STAIN SPRAY UNIT FOR A MOULDING FINISHING LINE SMC) SAUDER MANUFACTURING ARCHBOLD PLANT AREA I
R600 (FRONT BACK STAIN BOOTH (APPLICATION AREA) SMC) SAUDER MANUFACTURING ARCHBOLD PLANT AREA I	R603 (COLOR LAB SPRAY BOOTH (MANUAL SPRAY BOOTH) SMC) SAUDER MANUFACTURING ARCHBOLD PLANT AREA I	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. *State and Federally Enforceable Section*

#### 1. **Monitoring and Related Record Keeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*
- c. The permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*
  - ii. **For emission limitations, operational restrictions, and control device operating parameter limitations:**
    - (a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring and record keeping requirements specified in this permit; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters. In identifying each deviation, the permittee shall specify the applicable requirement for which the

deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) ,(ii) and (iii))*

- (b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))*

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and

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

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

- iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

## **2. 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 unit(s) 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 OAC rule 3745-15-06, 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).

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

## **3. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

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

## **4. Title IV Provisions**

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

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

## **5. Severability Clause**

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

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

## **6. General Requirements**

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

- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

*(Authority for term: OAC rule 3745-77-07(A)(7))*

**7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

**8. Marketable Permit Programs**

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

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

**9. Reasonably Anticipated Operating Scenarios**

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

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

**10. Reopening for Cause**

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

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.  
*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

#### **11. Federal and State Enforceability**

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

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

#### **12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

- i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

### **13. Permit Shield**

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

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

#### **14. Operational Flexibility**

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

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

#### **15. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

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

#### **16. Off-Permit Changes**

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

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as

insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)  
(Authority for term: OAC rule 3745-77-07(I))

#### **17. Compliance Method Requirements**

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

*(This term is provided for informational purposes only.)*

#### **18. Insignificant Activities**

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

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

#### **19. Permit to Install Requirement**

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

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

#### **20. Air Pollution Nuisance**

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

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

**B. State Only Enforceable Section**

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping information shall be submitted to 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**2. 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.

**3. 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.

**4. 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).

**5. 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.

**6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

## Part II - Specific Facility Terms and Conditions

### A. State and Federally Enforcable Section

1. This facility shall comply with all applicable requirements of 40 CFR Part 63, subpart JJ as well as with all the applicable requirements of subpart A of Part 63 (General Provisions), as identified in Table I of subpart JJ.
2. Work Practice Standards:
  - 2.a This facility shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in paragraphs (b) through (l) of 40 CFR Part 63, subpart JJ, section 63.803. The written work practice implementation plan shall be developed no more than 60 days after 12/7/98 and shall be available for inspection by the Director upon request. If the Director determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (b) through (l) of section 63.803 or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Director may require this facility to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.
  - 2.b This facility shall train all new and existing employees, including contract personnel, who are involved in finishing, gluing, cleaning, washoff operations, use of manufacturing equipment, or implementation of the requirements of subpart JJ. All new personnel, those hired after 12/7/98, shall be trained upon hiring. All existing personnel, those hired before 12/7/98, shall be trained within six months of 12/7/98. All personnel shall be given refresher training annually. This facility shall maintain a copy of the training program with the work practice implementation plan.

The training program shall include, at a minimum, the following:

    - i. a list of all current personnel by name and job description that are required to be trained;
    - ii. an outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
    - iii. lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
    - iv. a description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
  - 2.c This facility shall prepare, and maintain with the work practice implementation plan, a written leak inspection and maintenance plan that specifies the following:
    - i. a minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
    - ii. an inspection schedule;
    - iii. methods for documenting the date and results of each inspection and any repairs that were made;
    - iv. the time frame between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
      - (a) a first attempt at repair (e.g., tightening of packing glands) shall be made no later than (5) five calendar days after the leak is detected; and
      - (b) final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within (3) three months.
  - 2.d This facility shall develop an organic HAP solvent accounting form to record the following:
    - i. the quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in 63.801 of subpart JJ;
    - ii. the number of pieces washed off, and the reason for the washoff; and
    - iii. the quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
  - 2.e This facility shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of 40 CFR Part 63, subpart JJ in concentrations subject to MSDS reporting as required by OSHA.

**A. State and Federally Enforcable Section (continued)**

- 2.f** This facility shall not use compounds containing more than 8.0 percent, by weight, of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.
- 2.g** This facility shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
- 2.h** This facility shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
- i. to apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
  - ii. for touchup and repair under the following conditions:
    - (a) the touchup and repair occurs after completion of the finishing operations; or
    - (b) the touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
  - iii. when spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
  - iv. when emissions from the finishing application station are directed to a control device;
  - v. the conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
  - vi. the conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The affected source shall demonstrate technical or economic infeasibility by submitting to the Administrator a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:
    - (a) the production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
    - (b) the excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- 2.i** This facility shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.
- 2.j** This facility shall collect all organic HAP solvent used to clean spray guns into a normally closed container.
- 2.k** This facility shall prepare, and maintain with the work practice implementation plan a formulation assessment plan that:
- i. Identifies VHAP from the list presented in Table 5 of 40 CFR Part 63, subpart JJ that are being used in finishing operations by the affected source.
  - ii. Establishes a baseline level of usage by the affected source for each VHAP identified in section 63.803(l)(1). The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in section 63.803(l)(1). For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying that amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined by using the equation in 63.805(d) or (e).
  - iii. Tracks the annual usage of each VHAP identified in section 63.803(l)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.

## A. State and Federally Enforcable Section (continued)

iv. If, after November 1998, the annual usage of the VHAP identified in section 63.803(l)(1) exceeds its baseline level, then this facility shall provide written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the facility from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

(a) the exceedance is no more than 15.0 percent above the baseline;

(b) usage of the VHAP is below the de minimis level presented in Table 5 of subpart JJ for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system), which is determined using the procedures in 63.805(d) or (e);

(c) the affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or

(d) the source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.

v. If none of the above explanations are the reason for the increase, the facility shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the facility needs to take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

vi. If after November 1998, an affected source uses a VHAP of potential concern for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level, based on 70 year exposure levels and data provided in the proposed rulemaking pursuant to Section 112(g) of the CAA, for that pollutant. A list of VHAP of potential concern is provided in Table 6 of subpart JJ.

If usage of the VHAP of potential concern exceeds the de minimis level, then the affected source shall provide an explanation to the permitting authority that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in paragraph (l)(4)(iv) of section 63.803, then the affected source shall follow the procedures established in section 63.803(l)(5).

3. This facility shall submit a compliance certification with the semiannual report required by 63.807(c). The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.
4. Record keeping Requirements:
  - 4.a This facility shall fulfill all record keeping requirements of 63.10 of subpart A, according to the applicability criteria in 63.800(d) of subpart JJ.
  - 4.b This facility shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
    - i. records demonstrating that the operator training program required by 63.803(b) is in place;
    - ii. records collected in accordance with the inspection and maintenance plan required by 63.803(c);
    - iii. records associated with the cleaning solvent accounting system required by 63.803(d);
    - iv. records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by 63.803(h)(5);
    - v. records associated with the formulation assessment plan required by 63.803(l); and
    - vi. copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
  - 4.c This facility shall maintain records of all other information submitted with the compliance status report required by 63.9(h) and 63.807(b) and the semiannual reports required by 63.807(c).
  - 4.d This facility shall maintain all records in accordance with the requirements of 63.10(b)(1).
5. Reporting Requirements:

**A. State and Federally Enforceable Section (continued)**

- 5.a** This facility shall fulfill all reporting requirements of 63.7 through 63.10 of subpart A (General Provisions) according to the applicability criteria in 63.800(d) of subpart JJ.
- 5.b** This facility shall provide a written notification under section 63.803(l)(4) of subpart JJ. The notification shall include one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

**B. State Only Enforceable Section**

- 1.** The following insignificant emissions units are located at this facility:

P602 - sealed dryer (old stain dryer), P603 - sealed dryer (old topcoat dryer), P604 - stain dryer, P605 - topcoat dryer, P606 - seat upholstery line, P607 - automatic back upholstery line, P608 - kneeler upholstery area, P609 - laminating line, P610 - infrared stain drying tunnel, Z601 - clearcoat flash-off tunnel, Z602 - SM #1 air makeup unit, Z603 - SM #2 air makeup unit, Z604 - SM #3 air makeup unit, Z605 - SM #4 air makeup unit, Z606 - SM RFQ-01 air makeup unit, Z607 - SM RFQ-02 air makeup unit, Z608 - SM RFQ-03 air makeup unit, and Z609 - fugitive plant emissions.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install (PTI) for the emissions unit.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** BAGHOUSE#1 SMC (P600)  
**Activity Description:** SAUDER MANUFACTURING ARCHBOLD PLANT AREA I

#### A. State and Federally Enforceable Section

##### I. 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>
pneumatic wood waste handling system consisting of collection points, duct work and a 60,000-acfm baghouse (ME 3675)	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13508)	2.16 lbs of particulate emissions (PE)/hr, 9.46 TPY PE
		1.54 lbs of particulate matter less than 10 microns (PM10)/hr, 6.75 TPY PM10
		opacity restrictions (See A.I.2.c.)
	See A.I.2.d.	
	40 CFR Part 52.21 OAC rules 3745-31-10 through 20	0.0042 grain (gr) of PE/dry standard cubic foot (dscf), 0.0030 gr PM10/dscf (See A.I.2.e.)

##### 2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.
- 2.c Visible emissions from the pneumatic wood waste handling system shall not exceed 5% opacity, as a 6-minute average.
- 2.d The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21 and OAC rules 3745-31-10 through 20.

## 2. Additional Terms and Conditions (continued)

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

## II. Operational Restrictions

1. The pressure drop across the baghouse associated with the pneumatic wood waste handling system shall be maintained within the range of 1.5 to 8 inches of water while the emissions unit is in operation. The listed pressure drop range applies at all times except during periods of low flow and following rebagging until sufficient filter cake is developed on the bags.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the pneumatic wood waste handling system while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a weekly basis.
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

## IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the pneumatic wood waste handling system did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

## V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - 1.a The emissions testing shall be conducted within 6 months prior to permit expiration.

## V. Testing Requirements (continued)

- 1.b** Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

- 1.c** The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10, Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.
- 1.d** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.
- 1.e** Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- 1.f** A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.
- 2.** Compliance with the emissions limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
- 2.a** Emissions Limitations: 0.0042 gr PE/dscf, 2.16 lbs PE/hr, 9.46 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (60,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

## V. Testing Requirements (continued)

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

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (60,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

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

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

## VI. Miscellaneous Requirements

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

**B. State Enforceable Section**

**I. 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** BAGHOUSE#2 SMC (P601)  
**Activity Description:** SAUDER MANUFACTURING ARCHBOLD PLANT AREA I

#### A. State and Federally Enforceable Section

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

- 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>
pneumatic wood waste handling system consisting of collection points, duct work and a 60,000-acfm baghouse	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-31-05(A)(3) (PTI #03-13447)	0.0042 grain (gr) of particulate emissions (PE)/dry standard cubic foot (dscf), 2.16 lbs PE/hr, 9.46 TPY PE  0.0030 gr of particulate matter less than 10 microns (PM10)/dscf, 1.54 lb PM10/hr, 6.75 TPY PM10  See A.I.2.c.

##### 2. Additional Terms and Conditions

- This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.
- Visible emissions from the pneumatic wood waste handling system shall not exceed 5% opacity, as a 6-minute average.

##### II. Operational Restrictions

- The pressure drop across the baghouse associated with the pneumatic wood waste handling system shall be maintained within the range of 1.5 to 8 inches of water while the emissions unit is in operation. The listed pressure drop range applies at all times except during periods of low flow and following rebagging until sufficient filter cake is developed on the bags.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the pneumatic wood waste handling system while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a weekly basis.
2. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to eliminate the visible emissions.

### IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the pneumatic wood waste handling system did not comply with the allowable range specified above.
2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

### V. Testing Requirements

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - 1.a The emissions testing shall be conducted within 6 months prior to permit renewal.
  - 1.b Emissions testing shall be conducted to demonstrate compliance with the maximum PE outlet concentration of 0.0042 gr/dscf. Compliance with the maximum PE outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

Emissions testing shall also be conducted to demonstrate compliance with the maximum PM10 outlet concentration of 0.0030 gr/dscf. Compliance with the maximum PM10 outlet concentration shall be demonstrated by performing emissions testing on the emissions units that would be representative of wood waste handling systems with the greatest outlet concentration (see A.V.1.d).

- 1.c The following test method(s) shall be employed: for PE, Methods 1-5 of 40 CFR Part 60, Appendix A; and for PM10 Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office.

## V. Testing Requirements (continued)

- 1.d** Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the tests, and the person(s) who will be conducting the tests. The notification shall indicate the specific emissions unit/s which are being tested to meet the requirements of A.V.1.b. Accompanying the specified emissions units should be documentation which outlines why the specific emissions unit(s) are representative of wood waste handling system operations with the greatest outlet concentrations of PE and PM10. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emissions tests.
- 1.e** Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- 1.f** A comprehensive written report on the results of the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.
- 2.** Compliance with the emissions limitations in Section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:
- 2.a** Emissions Limitations: 0.0042 gr PE/dscf, 2.16 lbs PE/hr, 9.46 TPY PE

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying the maximum outlet concentration of 0.0042 gr PE/dscf by the maximum volumetric air flow (60,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PE emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A.

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

Applicable Compliance Method: The permittee shall demonstrate compliance with the grain loading limitation above based upon the results of emissions testing conducted in accordance with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr and TPY limits shall be determined by multiplying an emissions factor of 0.0030 gr PM10/dscf (verified by testing requirements in A.V.1) by the maximum volumetric air flow (60,000 acfm), and the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acfm, 60 minutes/hr and the emissions unit's maximum operating schedule of 8760 hrs/yr. If required, compliance with the hourly PM10 emissions rate shall be based on stack testing using the methods and procedures specified in Methods 1-5 of 40 CFR Part 60, Appendix A, with Method 201 or 201A or Methods 1-5 (including the back half of the sampling train and a particle size distribution) of 40 CFR Part 60, Appendix A.

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

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

Facility Name: SAUDER WOODWORKING COMPANY

Facility ID: 03-26-00-0160

Emissions Unit: BAGHOUSE#2 SMC (P601)

## VI. Miscellaneous Requirements

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

**B. State Enforceable Section**

**I. 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** FRONT BACK STAIN BOOTH (APPLICATION AREA) SMC (R600)  
**Activity Description:** SAUDER MANUFACTURING ARCHBOLD PLANT AREA I

#### A. State and Federally Enforceable Section

##### I. 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>
front back stain booth, with filters	OAC rule 3745-17-07(A)	none (See A.1.2.a.)
	OAC rule 3745-17-11(B)	none (See A.1.2.b.)
	OAC rule 3745-21-07(G)	none (See A.1.2.c.)
	40 CFR Part 63.802(a)(1)	stains: 1.0 lb volatile hazardous air pollutant (VHAP)/lb solids, as applied (See A.1.2.d.)

##### 2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.
- 2.c This facility is located in Fulton County, which is not considered a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new source." Therefore, pursuant to OAC rule 3745-21-07(A), it is exempt from the requirements of OAC rule 3745-21-07(G).
- 2.d The permittee shall only use stains in this emissions unit that comply with the applicable emission limitation in 40 CFR Part 63, Subpart JJ, 63.802(a)(1), on an "as applied" basis.

#### II. Operational Restrictions

None

#### III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the allowable coating material content restriction of 1.0 pound VHAP/lb solids, as applied, the permittee shall maintain records of the following information:
  - 1.a a certified product data sheet for each stain (certified product data sheet defined in 40 CFR 63.801); and
  - 1.b the VHAP content, in lbs VHAP/lb solids, as applied, of each stain.

#### IV. Reporting Requirements

1. The permittee shall submit semi-annual compliance certification reports, to the Director as required by 40 CFR Part 63, Subpart 63.807(c) that include the following information:
  - 1.a A statement that compliant stains have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance.
  - 1.b If the source was in noncompliance, the permittee should state the measures that were taken to bring the source into compliance.
2. Written notifications for annual VHAP usage exceedances (after November 1998) pertaining to the formulation assessment plan for finishing operations shall be submitted as required below:
  - 2.a The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual usage of a VHAP exceeded a baseline level for that VHAP pursuant to Part II, section A.2.k.ii. The written notification shall provide the information as required by Part II, section A.2.k.iv.
  - 2.b The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual usage of a VHAP exceeded the de minimis level established for that VHAP pursuant to Part II, section A.2.k.vi. The written notification shall provide information required by Part II, section A.2.k.vi.

#### V. Testing Requirements

1. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: stains - 1.0 lb VHAP/lb solids, as applied

Applicable Compliance Method: The permittee shall demonstrate compliance with this emissions limit using the record keeping specified in section A.III.1 and section A.V.2.
2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating shall be determined in accordance with 40 CFR 63.802(a)(1), 63.803(l)(2), and 63.805(a). EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during curing. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. The EPA Method 24 (40 CFR, Part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the curing, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct.

Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24," EPA-340/1-91-010.

#### VI. Miscellaneous Requirements

None

**B. State Enforceable Section**

**I. 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** FRONT BACK SEALER BOOTH SMC (R601)  
**Activity Description:** SAUDER MANUFACTURING ARCHBOLD PLANT AREA I

#### A. State and Federally Enforceable Section

##### I. 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>
front back sealer booth, with filters	OAC rule 3745-17-07(A)	none (See A.1.2.a.)
	OAC rule 3745-17-11(B)	none (See A.1.2.b.)
	OAC rule 3745-21-07(G)	none (See A.1.2.c.)
	40 CFR Part 63.802(a)(1)	sealers: 1.0 lb volatile hazardous air pollutant (VHAP)/lb solids, as applied (See A.1.2.d.)

##### 2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.
- 2.c This facility is located in Fulton County, which is not considered a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new source." Therefore, pursuant to OAC rule 3745-21-07(A), it is exempt from the requirements of OAC rule 3745-21-07(G).
- 2.d The permittee shall only use sealers in this emissions unit that comply with the applicable emission limitation in 40 CFR Part 63, Subpart JJ, 63.802(a)(1), on an "as applied" basis.

#### II. Operational Restrictions

None

#### III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the allowable coating material content restriction of 1.0 pound VHAP/lb solids, as applied, the permittee shall maintain records of the following information:
  - 1.a a certified product data sheet for each sealer (certified product data sheet defined in 40 CFR 63.801); and
  - 1.b the VHAP content, in lbs VHAP/lb solids, as applied, of each sealer.

#### IV. Reporting Requirements

1. The permittee shall submit semi-annual compliance certification reports, to the Director as required by 40 CFR Part 63, Subpart 63.807(c) that include the following information:
  - 1.a A statement that compliant sealers have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance.
  - 1.b If the source was in noncompliance, the permittee should state the measures that were taken to bring the source into compliance.
2. Written notifications for annual VHAP usage exceedances (after November 1998) pertaining to the formulation assessment plan for finishing operations shall be submitted as required below:
  - 2.a The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual usage of a VHAP exceeded a baseline level for that VHAP pursuant to Part II, section A.2.k.ii. The written notification shall provide the information as required by Part II, section A.2.k.iv.
  - 2.b The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual usage of a VHAP exceeded the de minimis level established for that VHAP pursuant to Part II, section A.2.k.vi. The written notification shall provide information required by Part II, section A.2.k.vi.

#### V. Testing Requirements

1. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: sealers - 1.0 lb VHAP/lb solids, as applied

Applicable Compliance Method: The permittee shall demonstrate compliance with this emissions limit using the record keeping specified in section A.III.1 and section A.V.2.

2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating shall be determined in accordance with 40 CFR 63.802(a)(1), 63.803(l)(2), and 63.805(a). EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during curing. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. The EPA Method 24 (40 CFR, Part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the curing, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct.

Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24," EPA-340/1-91-010.

#### VI. Miscellaneous Requirements

None

**B. State Enforceable Section**

**I. 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** FRONT BACK TOPCOAT BOOTH SMC (R602)  
**Activity Description:** SAUDER MANUFACTURING ARCHBOLD PLANT AREA I

#### A. State and Federally Enforceable Section

##### I. 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>
front back topcoat booth, with filters	OAC rule 3745-17-07(A)	none (See A.1.2.a.)
	OAC rule 3745-17-11(B)	none (See A.1.2.b.)
	OAC rule 3745-21-07(G)	none (See A.1.2.c.)
	40 CFR Part 63.802(a)(1)	topcoats: 1.0 lb volatile hazardous air pollutant (VHAP)/lb solids, as applied (See A.1.2.d.)

##### 2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.
- 2.c This facility is located in Fulton County, which is not considered a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new source." Therefore, pursuant to OAC rule 3745-21-07(A), it is exempt from the requirements of OAC rule 3745-21-07(G).
- 2.d The permittee shall only use topcoats in this emissions unit that comply with the applicable emission limitation in 40 CFR Part 63, Subpart JJ, 63.802(a)(1), on an "as applied" basis.

#### II. Operational Restrictions

None

#### III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the allowable coating material content restriction of 1.0 pound VHAP/lb solids, as applied, the permittee shall maintain records of the following information:
  - 1.a a certified product data sheet for each topcoat (certified product data sheet defined in 40 CFR 63.801); and
  - 1.b the VHAP content, in lbs VHAP/lb solids, as applied, of each topcoat.

#### IV. Reporting Requirements

1. The permittee shall submit semi-annual compliance certification reports, to the Director as required by 40 CFR Part 63, Subpart 63.807(c) that include the following information:
  - 1.a A statement that compliant topcoats have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance.
  - 1.b If the source was in noncompliance, the permittee should state the measures that were taken to bring the source into compliance.
2. Written notifications for annual VHAP usage exceedances (after November 1998) pertaining to the formulation assessment plan for finishing operations shall be submitted as required below:
  - 2.a The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual usage of a VHAP exceeded a baseline level for that VHAP pursuant to Part II, section A.2.k.ii. The written notification shall provide the information as required by Part II, section A.2.k.iv.
  - 2.b The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual usage of a VHAP exceeded the de minimis level established for that VHAP pursuant to Part II, section A.2.k.vi. The written notification shall provide information required by Part II, section A.2.k.vi.

#### V. Testing Requirements

1. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: topcoats - 1.0 lb VHAP/lb solids, as applied

Applicable Compliance Method: The permittee shall demonstrate compliance with this emissions limit using the record keeping specified in section A.III.1 and section A.V.2.

2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating shall be determined in accordance with 40 CFR 63.802(a)(1), 63.803(l)(2), and 63.805(a). EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during curing. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. The EPA Method 24 (40 CFR, Part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the curing, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct.

Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24," EPA-340/1-91-010.

#### VI. Miscellaneous Requirements

None

**B. State Enforceable Section**

**I. 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** COLOR LAB SPRAY BOOTH (MANUAL SPRAY BOOTH) SMC (R603)  
**Activity Description:** SAUDER MANUFACTURING ARCHBOLD PLANT AREA I

#### A. State and Federally Enforceable Section

##### I. 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>
color lab spray booth (manual spray booth), with filters	OAC rule 3745-17-07(A)	none (See A.1.2.a.)
	OAC rule 3745-17-11(B)	none (See A.1.2.b.)
	OAC rule 3745-21-07(G)	none (See A.1.2.c.)
	40 CFR Part 63.802(a)(1)	stains: 1.0 lb volatile hazardous air pollutant (VHAP)/lb solids, as applied (See A.1.2.d.)

##### 2. Additional Terms and Conditions

- 2.a This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- 2.b The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.
- 2.c This facility is located in Fulton County, which is not considered a "Priority I" county as indicated in paragraph (A) of OAC rule 3745-21-06, and is not a "new source." Therefore, pursuant to OAC rule 3745-21-07(A), it is exempt from the requirements of OAC rule 3745-21-07(G).
- 2.d The permittee shall only use stains in this emissions unit that comply with the applicable emission limitation in 40 CFR Part 63, Subpart JJ, 63.802(a)(1), on an "as applied" basis.

#### II. Operational Restrictions

None

#### III. Monitoring and/or Record Keeping Requirements

1. In order to demonstrate compliance with the allowable coating material content restriction of 1.0 pound VHAP/lb solids, as applied, the permittee shall maintain records of the following information:
  - 1.a a certified product data sheet for each stain (certified product data sheet defined in 40 CFR 63.801); and
  - 1.b the VHAP content, in lbs VHAP/lb solids, as applied, of each stain.

#### IV. Reporting Requirements

1. The permittee shall submit semi-annual compliance certification reports, to the Director as required by 40 CFR Part 63, Subpart 63.807(c) that include the following information:
  - 1.a A statement that compliant stains have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance.
  - 1.b If the source was in noncompliance, the permittee should state the measures that were taken to bring the source into compliance.
2. Written notifications for annual VHAP usage exceedances (after November 1998) pertaining to the formulation assessment plan for finishing operations shall be submitted as required below:
  - 2.a The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual usage of a VHAP exceeded a baseline level for that VHAP pursuant to Part II, section A.2.k.ii. The written notification shall provide the information as required by Part II, section A.2.k.iv.
  - 2.b The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual usage of a VHAP exceeded the de minimis level established for that VHAP pursuant to Part II, section A.2.k.vi. The written notification shall provide information required by Part II, section A.2.k.vi.

#### V. Testing Requirements

1. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: stains - 1.0 lb VHAP/lb solids, as applied

Applicable Compliance Method: The permittee shall demonstrate compliance with this emissions limit using the record keeping specified in section A.III.1 and section A.V.2.

2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating shall be determined in accordance with 40 CFR 63.802(a)(1), 63.803(l)(2), and 63.805(a). EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during curing. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. The EPA Method 24 (40 CFR, Part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the curing, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct.

Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24," EPA-340/1-91-010.

#### VI. Miscellaneous Requirements

None

**B. State Enforceable Section**

**I. 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** CLEARCOAT SPRAY UNIT FOR A MOULDING FINISHING LINE SMC (R604)  
**Activity Description:** SAUDER MANUFACTURING ARCHBOLD PLANT AREA I

#### A. State and Federally Enforceable Section

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

- 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>
clearcoat spray unit for moulding line, with filters	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-21-07(G)	none (See A.II.1.)
	OAC rule 3745-31-05 (PTI #03-7194)	17.09 lbs of organic compounds (OC)/day, including cleanup
	40 CFR Part 63.802(a)(1)	stains: 1.0 lb volatile hazardous air pollutant (VHAP)/lb solids, as applied (See A.I.2.c.)  topcoats: 1.0 lb VHAP/lb solids, as applied (See A.I.2.c.)

##### 2. Additional Terms and Conditions

- This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.
- The permittee shall only use stains and topcoats in this emissions unit that comply with the applicable emission limitation in 40 CFR Part 63, Subpart JJ, 63.802(a)(1) on an "as applied" basis.

##### II. Operational Restrictions

- The use of any photochemically reactive material (coating or cleanup material), as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
- The daily coating and cleanup material usage rates for this emissions unit shall not exceed 25 gallons and 1 gallon, respectively.
- The OC contents of the coatings and cleanup materials shall not exceed 0.42 pound/gallon of coating and 6.59 pounds/gallon of cleanup material, respectively.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:
  - a. the company identification of each coating and cleanup material employed;
  - b. documentation on whether or not each coating and cleanup material employed is a photochemically reactive material;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total number of gallons of all the coatings and all the cleanup materials employed (summation of c for all coatings and for all cleanup materials);
  - e. the OC content of each coating and cleanup material employed, in pounds of OC per gallon;
  - f. the OC emissions for each coating and for each cleanup material employed (c x e), in pounds; and
  - g. the total OC emissions for all the coatings and all the cleanup materials employed, in pounds (summation of f for all coatings + summation of f for all cleanup materials).
2. In order to demonstrate compliance with the allowable coating material content restriction of 1.0 pound VHAP/lb solids, as applied, the permittee shall maintain records of the following information:
  - 2.a a certified product data sheet for each stain and topcoat (certified product data sheet defined in 40 CFR 63.801); and
  - 2.b the VHAP content, in lbs VHAP/lb solids, as applied, of each stain and topcoat.

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any daily record showing the use of any photochemically reactive material (coating and/or cleanup material) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any daily record showing an exceedance of the daily coating and cleanup material usage restrictions of 25 gallons and 1 gallon, respectively. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 45 days of the exceedance occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any daily record showing the use of any noncomplying coating and/or cleanup material (i.e., for OC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 45 days after the exceedance occurs.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the daily OC emission limitation of 17.09 pounds. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
5. The permittee shall submit semi-annual compliance certification reports, to the Director as required by 40 CFR Part 63, Subpart 63.807(c) that include the following information:
  - 5.a A statement that compliant stains and topcoats have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance.
  - 5.b If the source was in noncompliance, the permittee should state the measures that were taken to bring the source into compliance.

#### IV. Reporting Requirements (continued)

6. Written notifications for annual VHAP usage exceedances (after November 1998) pertaining to the formulation assessment plan for finishing operations as required below:
  - 6.a The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual usage of a VHAP exceeded a baseline level for that VHAP pursuant to Part II, section A.2.k.ii. The written notification shall provide the information as required by Part II, section A.2.k.iv.
  - 6.b The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual usage of a VHAP exceeded the de minimis level established for that VHAP pursuant to Part II, section A.2.k.vi. The written notification shall provide information required by Part II, section A.2.k.vi.

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: 17.09 lbs OC/day  
  
Applicable Compliance Method: Compliance with the daily allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.
  - 1.b Usage Restrictions: 25 gallons/day of coatings usage, 1 gallon/day of cleanup materials usage  
  
Applicable Compliance Method: Compliance with coatings and cleanup materials usage restrictions shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.
  - 1.c OC Content Limitations: 0.42 pound/gallon of coating, 6.59 pounds/gallon of cleanup material  
  
Applicable Compliance Method: Compliance with OC content limitations above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.
  - 1.d Emission Limitation: stains and topcoats - 1.0 lb VHAP/lb solids, as applied  
  
Applicable Compliance Method: The permittee shall demonstrate compliance with this emissions limit using the record keeping specified in section A.III.2 and section A.V.2.
2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating shall be determined in accordance with 40 CFR 63.802(a)(1), 63.803(l)(2), and 63.805(a). EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during curing. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. The EPA Method 24 (40 CFR, Part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the curing, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct.  
  
Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24," EPA-340/1-91-010.

Facility Name: SAUDER WOODWORKING COMPANY  
Facility ID: 03-26-00-0160  
Emissions Unit: CLEARCOAT SPRAY UNIT FOR A MOULDING FINISHING

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** STAIN SPRAY UNIT FOR A MOULDING FINISHING LINE SMC (R605)  
**Activity Description:** SAUDER MANUFACTURING ARCHBOLD PLANT AREA I

#### A. State and Federally Enforceable Section

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

- 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>
stain spray unit for moulding line, with filters	OAC rule 3745-17-07(A)	none (See A.I.2.a.)
	OAC rule 3745-17-11(B)	none (See A.I.2.b.)
	OAC rule 3745-21-07(G)	none (See A.II.1.)
	OAC rule 3745-31-05 (PTI #03-7194)	65.59 lbs of organic compounds (OC)/day, including cleanup
	40 CFR Part 63.802(a)(1)	stains: 1.0 lb volatile hazardous air pollutant (VHAP)/lb solids, as applied (See A.I.2.c.)  topcoats: 1.0 lb VHAP/lb solids, as applied (See A.I.2.c.)

##### 2. Additional Terms and Conditions

- This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-11 is not applicable.
- The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(ii), Figure II of OAC rule 3745-17-11 does not apply. Also, Table I does not apply because the facility is located in Fulton County.
- The permittee shall only use stains and topcoats in this emissions unit that comply with the applicable emission limitation in 40 CFR Part 63, Subpart JJ, 63.802(a)(1) on an "as applied" basis.

##### II. Operational Restrictions

- The use of any photochemically reactive material (coating or cleanup material), as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
- The daily coating and cleanup material usage rates for this emissions unit shall not exceed 9.2 gallons and 1 gallon, respectively.
- The OC contents of the coatings and cleanup materials shall not exceed 6.4 pound/gallon of coating and 6.59 pounds/gallon of cleanup material, respectively.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:
  - a. the company identification of each coating and cleanup material employed;
  - b. documentation on whether or not each coating and cleanup material employed is a photochemically reactive material;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the total number of gallons of all the coatings and all the cleanup materials employed (summation of c for all coatings and for all cleanup materials);
  - e. the OC content of each coating and cleanup material employed, in pounds of OC per gallon;
  - f. the OC emissions for each coating and for each cleanup material employed (c x e), in pounds; and
  - g. the total OC emissions for all the coatings and all the cleanup materials employed, in pounds (summation of f for all coatings + summation of f for all cleanup materials).
2. In order to demonstrate compliance with the allowable coating material content restriction of 1.0 pound VHAP/lb solids, as applied, the permittee shall maintain records of the following information:
  - 2.a a certified product data sheet for each stain and topcoat (certified product data sheet defined in 40 CFR 63.801); and
  - 2.b the VHAP content, in lbs VHAP/lb solids, as applied, of each stain and topcoat.

### IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any daily record showing the use of any photochemically reactive material (coating and/or cleanup material) in this emissions unit. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 45 days after the exceedance occurs.
2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any daily record showing an exceedance of the daily coating and cleanup material usage restrictions of 25 gallons and 1 gallon, respectively. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 45 days of the exceedance occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office) in writing of any daily record showing the use of any noncomplying coating and/or cleanup material (i.e., for OC contents). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 45 days after the exceedance occurs.
4. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the daily OC emission limitation of 17.09 pounds. All quarterly deviation reports shall be submitted in accordance with paragraph A.1.c of the General Terms and Conditions of this permit.
5. The permittee shall submit semi-annual compliance certification reports, to the Director as required by 40 CFR Part 63, Subpart 63.807(c) that include the following information:
  - 5.a A statement that compliant stains and topcoats have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance.
  - 5.b If the source was in noncompliance, the permittee should state the measures that were taken to bring the source into compliance.

#### IV. Reporting Requirements (continued)

6. Written notifications for annual VHAP usage exceedances (after November 1998) pertaining to the formulation assessment plan for finishing operations as required below:
  - 6.a The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual usage of a VHAP exceeded a baseline level for that VHAP pursuant to Part II, section A.2.k.ii. The written notification shall provide the information as required by Part II, section A.2.k.iv.
  - 6.b The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual usage of a VHAP exceeded the de minimis level established for that VHAP pursuant to Part II, section A.2.k.vi. The written notification shall provide information required by Part II, section A.2.k.vi.

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:
  - 1.a Emission Limitation: 65.59 lbs OC/day  
  
Applicable Compliance Method: Compliance with the daily allowable OC emission limitation shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.
  - 1.b Usage Restrictions: 9.2 gallons/day of coatings usage, 1 gallon/day of cleanup materials usage  
  
Applicable Compliance Method: Compliance with coatings and cleanup materials usage restrictions shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.
  - 1.c OC Content Limitations: 6.4 pound/gallon of coating, 6.59 pounds/gallon of cleanup material  
  
Applicable Compliance Method: Compliance with OC content limitations above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.
  - 1.d Emission Limitation: stains and topcoats - 1.0 lb VHAP/lb solids, as applied  
  
Applicable Compliance Method: The permittee shall demonstrate compliance with this emissions limit using the record keeping specified in section A.III.2 and section A.V.2.
2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating shall be determined in accordance with 40 CFR 63.802(a)(1), 63.803(l)(2), and 63.805(a). EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during curing. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. The EPA Method 24 (40 CFR, Part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the curing, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct.  
  
Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24," EPA-340/1-91-010.

Facility Name: SAUDER WOODWORKING COMPANY  
Facility ID: 03-26-00-0160  
Emissions Unit: STAIN SPRAY UNIT FOR A MOULDING FINISHING LINE :

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. 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>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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