

Facility ID: 1409040847 Issuance type: Final State Permit To Operate

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

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

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

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1409040847 Emissions Unit ID: R006 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R006 - Prototype Line - Wood coating line and associated cleaning, washoff, and gluing operations	OAC rule 3745-31-05(A)(3) (PTI 14-04014)	See term and condition A.2.d.
	OAC rule 3745-31-05(C) Synthetic Minor to Avoid Reasonably Available Control Technology (RACT) for Wood Furniture Manufacturing Operations	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2), OAC rule 3745-21-09(U)(2)(f), and OAC rule 3745-31-05(C). See term and condition A.2.a.
	Synthetic Minor for Hazardous Air Pollutants (HAPs) to Avoid NESHAP 40 CFR Part 63, Subpart JJ and Title V	See term and condition A.2.e.
	OAC rule 3745-21-07(G)(2)	See term and condition A.2.b.
	OAC rule 3745-21-09(U)(2)(f)	See term and condition A.2.c.

2. Additional Terms and Conditions

- (a) The total allowable volatile organic compound (VOC) emissions from all the wood finishing processes and associated cleaning, washoff and gluing processes located at this facility shall not exceed 24.9 TPY, based on a rolling, 12-month summation. The 24.9 TPY rolling, 12-month summation includes emissions from metal coating. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means. "Volatile organic compound" means any volatile organic compound as defined in OAC rule 3745-21-01(B)(6).
The VOC emissions from emissions unit R006, when coating wood products, shall not exceed 8 pounds per hour and 40 pounds per day.
The VOC emissions from emissions unit R006, when coating metal products, shall not exceed 75 pounds per day.
The annual VOC emissions (including cleaning material emissions) from emissions unit R006 shall not exceed 0.20 ton per month and 2.4 tons per year for wood products and metal products.
The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units R001 (Wood Coating Line), R002 (Wood Coating Line), R003 (Wood Coating Line), R004 (Wood Coating Line), R005 (Wood Coating Line), R006 (Prototype Coating Line), other de minimus air contaminant source, as defined in OAC rule 3745-15-05, and other air contaminant sources exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 installed subsequent to the issuance of this permit, combined, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the emissions units identified in term and condition A.2.e:
 - a. The name and identification number of each coating, employed;
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)];
 - d. The number of gallons of each coating employed;
 - e. The name and identification of each cleaning, washoff and gluing material employed;
 - f. The individual HAP content for each HAP of each cleaning, washoff and gluing material, in pounds of individual HAP per gallon of cleaning material, washoff and gluing material as applied;
 - g. The total combined HAP content of each cleaning, washoff and gluing material, in pounds of combined HAPs per gallon of cleaning, washoff and gluing material, as applied [sum all the individual HAP contents from (f)];
 - h. The number of gallons of each cleaning, washoff and gluing material employed;
 - i. The total individual HAP emissions for each HAP from all coatings and cleaning, washoff and gluing materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleaning, washoff and gluing material];
 - j. The total combined HAP emissions from all coatings and cleaning, washoff and gluing materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleaning, washoff and gluing material];
 - k. The updated rolling, 12-month summation of emissions for each individual HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - l. The updated rolling, 12-month summation of emissions for total combined HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

Monthly records shall be completed within 15 days following the end of each calendar month.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on an individual emissions unit basis.

2. The permittee shall maintain the following daily records for emissions unit R006:
 - a. The company identification for each coating and cleaning material employed;
 - b. The number of gallons of each coating and cleaning material employed for wood products;
 - c. The number of gallons of each coating and cleaning material employed for metal products;
 - d. The organic compound content of each coating and cleaning material, in pounds per gallon;
 - e. The organic compound emission rate for each coating and cleaning material, in pounds per day, for wood products;
 - f. The sum total organic compound emission rate for all coatings and cleaning material in pounds per day, for wood products;
 - g. The total number of hours the coatings and cleaning material were applied in the operation for wood products;
 - h. The average pounds per hour organic compound emission rate for wood products which results from dividing (f) above by (g) above;
 - i. The organic compound emission rate for each coating and cleaning material, in pounds per day, for metal products; and
 - j. The sum total organic compound emission rate for all coatings and cleaning material in pounds per day, for metal products.

[Note: The coating information must be for the coatings as applied, including any thinning solvents added at the coating line.]
3. The permittee shall maintain monthly records of the combined VOC emissions, in tons per month, for wood and metal products.
4. The permittee shall collect and record the following information each month for all the wood finishing processes and associated cleaning, washoff and gluing processes located at this facility, including emissions units R001, R002, R003, R004, R005, and R006 for the purpose of demonstrating compliance with the annual VOC emission rate of 24.9 TPY VOC combined, based on a rolling 12-month summation:
 - a. The name and identification number of each coating and cleaning, washoff and gluing material employed;

- b. The volume, in gallons, of each coating and cleaning, washoff and gluing material employed;
- c. The VOC content of each coating and cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied;
- d. The amount of VOC emitted for all coating and cleaning, washoff and gluing materials employed, in pounds per month;
- e. The rolling 12-month usage for coating and cleaning, washoff and gluing materials, in gallons. This shall include the information for the current month and the preceding eleven calendar months; and
- f. The rolling 12-month VOC emission rate in tons per year (in tons, rounded off to one decimal place). This shall include the information for the current month and the preceding eleven calendar months.

Monthly records shall be completed within 15 days following the end of each calendar month.

- 5. The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from their date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.

D. Reporting Requirements

- 1. The permittee shall submit quarterly written reports which identify any daily record which shows an exceedance of the 8 pounds per hour and/or 40 pounds per day VOC emissions limits when coating wood products. The report shall include a copy of each such record along with the actual hourly VOC emissions rate and/or the actual daily VOC emissions as well as any corrective actions taken to address the exceedance.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively).

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

- 2. The permittee shall submit quarterly written reports which identify any daily record which shows an exceedance of the 75 pounds per day VOC emissions when coating metal products. The report shall include a copy of each such record along with the actual VOC emissions when coating metal products as well as any corrective action taken to address the exceedance.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively).

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

- 3. The permittee shall submit quarterly written reports which identify any monthly record which shows an exceedance of the 0.20 ton per month VOC emission limit. The report shall include a copy of each such record along with the actual VOC emissions when coating metal products as well as any corrective action taken to address the exceedance.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively).

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

- 4. The permittee shall submit quarterly written reports which identify the updated rolling 12-month summation of volatile organic compound emissions in TPY for all coatings and cleaning, washoff and gluing materials employed for each calendar month during the reporting period for all the wood finishing processes and associated cleaning, washoff and gluing processes at the facility, including emissions units R001, R002, R003, R004, R005, and R006.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively).

- 5. If the permittee has a rolling, 12-month record that exceeds 24.9 tons of VOC from combined operations associated with the manufacture of wood furniture, or wood furniture components, the permittee shall submit the following:

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

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

plan for ozone.

- c. Exceeding the 24.9 TPY VOC limit is a violation for each day of the last month of each 12 month period in which the 24.9 TPY limit is exceeded, regardless of whether a compliance plan is submitted.
6. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedance of the rolling, 12-month HAP emission limitations outlined in term and condition A.2.e. The report shall include a copy of each such record along with corrective actions that were taken to achieve compliance. If no exceedances occurred during the reporting period, then a report is required stating so.

The reports shall be submitted to the Director (the Hamilton County Department of Environmental Services) by February 15, May 15, August 15, and November 15 of each year and shall cover the previous three calendar months (October through December, January through March, April through June and July through September, respectively).

E. Testing Requirements

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

Method 24 or 24A can be performed by the permittee or other party (i.e., the permittee's coating supplier).

2. Compliance with the VOC emission limitations outlined in term A.2.b shall be demonstrated by the required recordkeeping in section C.2.
3. Compliance with the VOC emission limitations outlined in term A.2.c shall be demonstrated by the required recordkeeping in section C.2.
4. Compliance with the VOC emission limitations outlined in term A.2.d shall be demonstrated by the required recordkeeping in section C.3.
5. Compliance with the 12-month rolling VOC emission limitation outlined in term A.2.a shall be demonstrated by the required recordkeeping in section C.4.
6. Compliance with the 12-month rolling HAP limitations outlined in term A.2.e shall be demonstrated by the record keeping in section C.1.

F. Miscellaneous Requirements

1. The following Sections of this permit are federally enforceable: A, B, C, D, and E.
2. Except as otherwise defined in Sections A through E, the following terms have the following meanings:

"Employed" shall mean the use of coatings and/or cleanup solvent in a manner which contributes directly to emissions, but shall not include such use which is a part of a recycle or reuse process or procedure, except for actual emissions.

"PRM" shall mean any photochemically reactive material or substance containing a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5).

"Volatile organic compound" shall mean any volatile organic compound as defined in OAC rule 3745-21-01(B)(6).
3. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic pollutant will be less than 1.0 ton. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that a new permit to install application would be required for an emissions unit if changes in the composition of the materials or use of new materials would cause the emissions of any pollutant that has a listed Threshold Limit Value (TLV), as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices"), to increase to above 1.0 ton per year.