

Facility ID: 1431070324 Issuance type: Final State Permit To Operate

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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: 1431070324 Emissions Unit ID: R004 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>
R004 - Wood coating line and associated cleaning, washoff and gluing operations	OAC rule 3745-31-05(C) (PTI 14-05249)	Volatile Organic Compound (VOC) emissions shall not exceed 7.3 TPY from emissions unit R004. Volatile Organic Compound (VOC) emissions shall not exceed 24.9 TPY from emissions units R001, R002, R003 and R004, combined, based on a rolling 12 month summation.
	OAC rule 3745-17-11(C)	See terms A.2.a and A.2.b. See term A.2.c. See sections B.1, C.5, C.6, C.7, C.8 and D.4.

2. Additional Terms and Conditions

- (a) The total allowable volatile organic compound (VOC) emissions from all the woodfinishing 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. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.
The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units B001, F001, P001, P002, P003, P901, R001, R002, R003, R004, 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.

* This assumes the HAPs emitted are the same as the amount of HAPs used since all HAPs used evaporate.
The permittee shall operate the dry filtration system whenever this emissions unit is in operation.

B. Operational Restrictions

1. The permittee shall operate, and maintain a dry filtration system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee; and all such documentation from the manufacturer and the record of any modifications determined necessary by the permittee or operator shall be maintained as a facility record and shall be made available to the Ohio EPA upon request.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for the purpose of determining annual VOC emissions for emissions unit R004:
 - a. The company identification for each coating and cleanup material employed.

- b. The number of gallons of each coating and cleanup material employed.
 - c. The volatile organic compound content of each coating and cleanup material, in pounds per gallon.
 - d. The total organic compound emission rate for all coating and cleanup materials, in tons.
 - e. The annual VOC emissions rate for this emissions unit in tons per year. This shall be determined by summing the records in term C.1.d for the calendar year.
2. The permittee shall collect and record the following information each month for emissions units R001, R002, R003 and R004, combined:
- a. The name and identification number of each coating, cleaning, washoff and gluing material employed. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.
 - b. The volume, in gallons, of each coating, cleaning, washoff and gluing material employed.
 - c. The VOC content of each coating, cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied.
 - d. The amount of VOC emitted for all coating, cleaning, washoff and gluing materials employed, in lbs. per month (b x c).
 - e. The rolling, 12-month* usage for coating, cleaning, washoff and gluing materials, in gallons.
 - f. The rolling, 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place).
- *A rolling, 12-month period includes the previous set of 12 calendar months.
- g. Monthly records shall be completed within 15 days following the end of each calendar month and shall include the updated rolling, 12-month VOC emission rate.
- The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.
3. The permittee shall collect and record the following information each month for the emission units identified in term A.2.b:
- a. The name and identification number of each coating, employed.
 - b. The individual Hazardous Air Pollutant (HAP)* content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied.
 - c. The total combined HAP content of each coating in pounds of combined HAPs per gallon of coating, as applied [sum all the individual HAP contents from (b)].
 - d. The number of gallons of each coating employed.
 - e. The name and identification of each cleaning material employed.
 - f. The individual HAP content for each HAP of each cleaning material, in pounds of individual HAP per gallon of cleaning material, as applied.
 - g. The total combined HAP content of each cleaning material, in pounds of combined HAPs per gallon of cleaning material, as applied [sum all the individual HAP contents from (f)].
 - h. The number of gallons of each cleaning material employed.
 - i. The total individual HAP usage for each HAP from all coatings and cleaning materials employed, in pounds or tons per month [for each HAP the sum of (b) times (d) for each coating plus the sum of (f) times (h) for each cleaning material].
- j. The total combined HAP usage from all coatings and cleaning materials employed, in pounds or tons per month [the sum of (c) times (d) for each coating plus the sum of (g) times (h) for each cleaning material].
- k. The updated rolling, 12-month summation of usage for each individual HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
 - l. The updated rolling, 12-month summation of usage for total combined HAP emissions**, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.
- * A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Hamilton County Department of Environmental Services contact. This information does not have to be kept on a individual emissions unit basis.
- ** This assumes the HAP(s) emitted are the same as the amounts of HAP(s) used since all HAP(s) used evaporated.
4. 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 the 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.

5. The permittee shall conduct periodic inspections of the dry filtration system to determine whether the particulate control system is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
6. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
7. The permittee shall document each inspection (periodic and annual) of the dry filtration system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

8. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry filtration system was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

D. Reporting Requirements

1. The permittee shall submit annual reports which summarize the following for this emissions unit:
 - a. The total VOC emissions from emissions unit for the previous calendar year.
 - b. The total number of gallons of coating, cleaning, washoff and gluing cleanup materials employed in this emissions unit for the previous calendar year.

The reports shall be submitted by January 31 of each year.
2. If the facility (emissions units R001 - R004) 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 .
 - 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.
3. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP usage limitations set forth in term A.2.b. The permittee shall submit annual reports which identify all exceedances of these limitations, as well as the corrective actions that were taken to achieve compliance. These reports shall be submitted by January 31 of each year. If no exceedances occurred during the reporting period then a report is required stating so.
4. The permittee shall submit quarterly deviation (excursion) reports that identify any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emission limit of 24.9 TPY VOC from emissions units R001, R002, R003 and R004, combined, based on a rolling 12-month summation shall be demonstrated by the recordkeeping requirements in term and condition C.2.
2. Compliance with the HAP emissions limitation in term A.2.b shall be demonstrated by the record keeping in term C.3.
3. Compliance with the emission limit of 7.3 TPY VOC from emissions unit R004 shall be demonstrated by the record keeping in term C.1.
4. 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.

F. Miscellaneous Requirements

1. The following terms and conditions of this permit are federally enforceable: A, B, C, D, and E.
2. This Federally Enforceable Permit limits the potential emissions of organic compounds from the wood furniture finishing processes and associated cleaning, washoff and gluing processes located at this facility to no more than 24.9 TPY during any rolling, 12-month period. Should VOC emissions from the wood finishing processes and associated cleaning, washoff and gluing processes exceed 24.9 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days. See term D.2.