

Facility ID: 1431473393 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.

- [Go to Part II for Emissions Unit R001](#)
- [Go to Part II for Emissions Unit R002](#)
- [Go to Part II for Emissions Unit R003](#)
- [Go to Part II for Emissions Unit R004](#)

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Facility ID: 1431473393 Emissions Unit ID: R001 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>
R001 - Wood Furniture Coating Line - Modification	OAC rule 3745-31-05(A)(3) (PTI 14-05454)	Volatile Organic Compound (VOC) emissions shall not exceed 8 pounds per hour, 40 pounds per day and 7.3 tons per year. See terms A.2.a and A.2.b. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
	OAC rule 3745-21-07(G)(2) & (4)	The requirements established pursuant to this rule are equivalent to the requirements of OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(C)	Volatile Organic Compound (VOC) emissions shall not exceed 24.9 tons per year from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility, based on a rolling, 12-month summation. See terms A.2.d and A.2.e.

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 6.55 pounds per gallon, as applied.

The volatile organic compound (VOC) content of each cleaning material employed in this emissions unit shall not exceed 7.91 pounds per gallon, as applied.

Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the VOC content limitations and emission limitations outlined in this permit.

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 tons per year (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(3.16 mmBtu/hr wood boiler), P001(sawdust handling system w/fabric filters), R001 (wood furniture coating line), R002 (lacquer paint spray room #2), R003 (quick wood finish line), R004 (wood furniture coating line), all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, 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.

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
- The company identification for each coating and cleaning material employed;
 - The number of gallons of each coating and cleaning material employed, as applied;
 - The volatile organic compound content of each coating and cleaning material, in pounds per gallon, as applied;
 - The total volatile organic compound emission rate for all coatings and cleaning materials, in pounds per day [the sum of (b x c) for each coating and cleaning material employed];
 - The total number of hours the emissions unit was in operation; and
 - The average hourly volatile organic compound emission rate for all coatings and cleaning materials, i.e., (d)/(e), in pounds per hour (average).
 - The total annual VOC emissions in tons per year (the summation of C.1.d for all the days of the year divided by 2000).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall collect and record the following information each month for emissions units R001, R002, R003 and R004, combined:
- 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.
 - The volume, in gallons, of each coating, cleaning, washoff and gluing material employed.
 - The VOC content of each coating, cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied.
 - The amount of VOC emitted for all coating, cleaning, washoff and gluing materials employed, in pounds per month (b x c).
 - The rolling, 12-month* usage for coating, cleaning, washoff and gluing materials, in gallons.
 - 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 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.
4. The permit to operate for this emissions unit R001 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene
 TLV (ug/m3): 188,000
 Maximum Hourly Emission Rate (lbs/hr): 8
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2310
 MAGLC (ug/m3): 4,476

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee

determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, 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");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
5. The permittee shall collect and record the following information each month for the emissions units identified in term 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 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 emissions 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 and the sum of (f) times (h) for each cleanup material];
 - j. The total combined HAP emissions 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 cleanup material];
 - k. The updated rolling, 12-month summation for each individual HAP emissions, 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 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 Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall submit quarterly reports which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY for each calendar month from emissions units R001, R002, R003 and R004, combined. These reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous calendar quarter. Exceeding the rolling, 12-month limit is a violation for each day of the last month of each 12 month period in which the limit is exceeded, regardless of whether a

compliance plan is submitted.

3. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each hour during which the volatile organic compound emissions from the coatings and cleaning materials exceeded 8 pounds per hour, and the actual volatile organic compound emissions for each such hour.
 - b. An identification of each day during which the volatile organic compound emissions from the coatings and cleaning materials exceeded 40 pounds per day, and the actual volatile organic compound emissions for each such day.

If no exceedances occurred during the reporting period then a report is required stating so.
4. If the facility (R001, R002, R003, and 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.
5. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
6. The permittee shall notify the Hamilton County Department of Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.e. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
7. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitations:
Volatile Organic Compound (VOC) emissions shall not exceed 8 pounds per hour, 40 pounds per day and 7.3 tons per year.

Applicable Compliance Method:
Compliance with the hourly, daily and annual organic compound emission limitations shall be based upon the record keeping requirements specified in term C.1 of this permit.
2. VOC Content Limitations:

The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 6.55 pounds of VOC per gallon of coating, as applied.

The volatile organic compound (VOC) content of each cleaning material employed in this emissions unit shall not exceed 7.91 pounds of VOC per gallon of cleanup material, as applied.

Applicable Compliance Method:
Compliance with the VOC content limitations in these terms and conditions shall be determined in accordance with USEPA Method 24A. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24A.
3. Emission Limitation:

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.

Applicable Compliance Method:
Compliance with term A.2.d shall be demonstrated by the recordkeeping requirements in section C.2.
4. Compliance with the HAP emission limitations in term A.2.e shall be determined by the record keeping in term C.5.

F. Miscellaneous Requirements

1. This Federally Enforceable Permit limits the potential emissions of volatile 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 section D.4.

2. The following terms and conditions in this permit are federally enforceable: A, B, C.1 - C.3, C.5, D and E.

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Facility ID: 1431473393 Emissions Unit ID: R002 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>
R002 - Wood Furniture Coating Line - Modification	OAC rule 3745-31-05(A)(3) (PTI 14- 05454)	Volatile Organic Compound (VOC) emissions shall not exceed 150 pounds per day, from coatings only. See terms A.2.a and A.2.b. See sections B.1 and B.2. Volatile Organic Compound (VOC) emissions shall not exceed 17.45 tons per year from emissions units R002, R003 and R004 combined.
	OAC rule 3745-21-07(G) OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). Exempt, see section B.3. Volatile Organic Compound (VOC) emissions shall not exceed 24.9 tons per year from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility, based on a rolling, 12-month summation. See terms A.2.d and A.2.e.

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) content of each coating employed in emissions units R002, R003 and R004 shall not exceed 6.0 pounds of VOC per gallon of coating, as applied.
 The volatile organic compound (VOC) content of each cleaning material employed in emissions units R002, R003 and R004 shall not exceed 6.57 pounds of VOC per gallon of cleanup material, as applied. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage and VOC content limitations and emission limitations.
 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 tons per year (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(3.16 mmBtu/hr wood boiler), P001(sawdust handling system w/fabric filters), R001 (wood furniture coating line), R002 (lacquer paint spray room #2), R003 (quick wood finish line), R004 (wood furniture coating line), all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources,

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.

B. Operational Restrictions

1. The maximum coating usage for emissions unit R002 shall not exceed 25 gallons per day.
2. The maximum annual coating and cleanup material usage for emissions units R002, R003 and R004 combined shall not exceed the following:
 - 4367 gallons of coatings per year, based on a rolling, 12-month summation of the usage figures.
 - 1324 gallons for cleanup materials per year, based on a rolling, 12-month summation of the usage figures.
3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and cleaning material employed, as applied;
 - b. The number of gallons of each coating and cleaning material employed, as applied;
 - c. The volatile organic compound content of each coating and cleaning material, as applied, in pounds per gallon;
 - d. The total volatile organic compound emission rate for all coatings and cleaning materials, in pounds per day [the sum of (b x c) for each coating and cleanup material employed]; and
 - e. A record of each organic material employed in this emissions unit indicating whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
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 pounds 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. The rolling, 12-month* usage for coating, cleaning, washoff and gluing materials, in gallons from emissions units R002, R003 and R004.
 - h. The rolling, 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place) from emissions units R002, R003 and R004.

*A rolling, 12-month period includes the previous set of 12 calendar months.
 - i. 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 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.
4. The permit to operate for this emissions unit R002 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene
TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 4.58
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1329
 MAGLC (ug/m3): 4,476

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, 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");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
5. The permittee shall collect and record the following information each month for the emissions units identified in term 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 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 emissions 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 and the sum of (f) times (h) for each cleanup material];
 - j. The total combined HAP emissions 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 cleanup material];
 - k. The updated rolling, 12-month summation for each individual HAP emissions, 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 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 Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.
6. The permittee shall collect and record the following information for emissions units R002, R003 and R004 for the purpose of demonstrating compliance with the material usage limitation outlined in sections B.1 and B.2 and the combined annual limit of 17.45 tons per year VOC limitation outlined in section A.1 of this permit:

- a. The company identification for each coating and cleanup material employed, as applied.
- b. The number of gallons of each coating and cleanup material employed, as applied.
- c. The volatile organic compound content of each coating and cleanup material, as applied, in pounds of VOC per gallon.
- d. The total volatile organic compound emission rate for all coatings and cleanup materials, in tons per year [the sum of (b x c) for each coating and cleaning material employed divided by 2000].

D. Reporting Requirements

1. The permittee shall submit quarterly reports to the Hamilton County Environmental Services which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY and the updated rolling, 12-month summation of the coating and cleaning material usages for each calendar month from emissions units R002, R003 and R004, combined. These reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous calendar quarter. Exceeding the rolling, 12-month limit is a violation for each day of the last month of each 12 month period in which the limit is exceeded, regardless of whether a compliance plan is submitted.
2. The permittee shall submit quarterly reports to the Hamilton County Environmental Services which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY for each calendar month from emissions units R001, R002, R003 and R004, combined. These reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous calendar quarter. Exceeding the rolling, 12-month limit is a violation for each day of the last month of each 12 month period in which the limit is exceeded, regardless of whether a compliance plan is submitted.
3. The permittee shall notify the Hamilton County Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e VOC contents) and/or any exceedances of the 150 pounds per day VOC emission limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
4. The permittee shall notify the Hamilton County Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Environmental Services within 30 days after the exceedance occurs.
5. If the facility (R001, R002, R003, and 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 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 notify the Hamilton County Environmental Services of any exceedance of the HAP emission limitations outlined in term and condition A.2.a. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.)
7. The permittee shall notify the Hamilton County Environmental Services in writing of any daily record showing any exceedance of the 25 gallons per day usage limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Environmental Services within 30 days following the end of the calendar month.
8. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
9. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted to the Hamilton County Environmental Services by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitations:
Volatile Organic Compound (VOC) emissions shall not exceed 150 pounds per day, from coatings only.

Volatile Organic Compound (VOC) emissions shall not exceed 17.45 tons per year from emissions units R002, R003 and R004 combined.

Applicable Compliance Method:

Compliance with the daily and annual organic compound emission limitations shall be based upon the record keeping requirements specified in terms C.1 and C.2 of this permit.

For coatings and cleanup, the calculations are demonstrated in the following equation:

Pounds of VOC/gallon of material x gallons of material/year divided by 2000 pounds/ton = tons of VOC per year.

2. Usage Limitations:

The maximum coating usage for emissions unit R002 shall not exceed 25 gallons per day.

The maximum annual coating and cleanup material usage for emissions units R002, R003 and R004 combined shall not exceed the following:

4367 gallons of coatings per year, based on a rolling, 12-month summation of the usage figures.

1324 gallons for cleanup materials per year, based on a rolling, 12-month summation of the usage figures.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in terms C.1 and C.2 of this permit.

3. VOC Content Limitations:

The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 6.0 pounds of VOC per gallon of coating, as applied.

The volatile organic compound (VOC) content of each cleaning material employed in this emissions unit shall not exceed 6.57 pounds of VOC per gallon of cleanup material, as applied.

Applicable Compliance Method:

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

4. Compliance with the HAP emission limitations in term A.2.e shall be determined by the record keeping in term C.5.

5. Compliance with the emission limit of 24.9 TPY VOC from from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility combined, based on a rolling 12-month summation shall be demonstrated by the recordkeeping requirements in term and condition C.2.

F. **Miscellaneous Requirements**

1. This Federally Enforceable Permit limits the potential emissions of volatile 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.5.

2. The following terms and conditions in this permit are federally enforceable: A, B, C.1 - C.3, C.5, D and E.

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

Facility ID: 1431473393 Emissions Unit ID: R003 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>
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R003 - Wood Furniture Coating Line - Modification	OAC rule 3745-31-05(A)(3) (PTI 14-05454)	Volatile Organic Compound (VOC) emissions shall not exceed 240 pounds per day from coatings only. See terms A.2.a and A.2.b. See sections B.1 and B.2. Volatile Organic Compound (VOC) emissions shall not exceed 17.45 tons per year from emissions units R002, R003 and R004 combined. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). Exempt, see section B.3. Volatile Organic Compound (VOC) emissions shall not exceed 24.9 tons per year from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility, based on a rolling, 12-month summation. See terms A.2.d and A.2.e.
	OAC rule 3745-21-07(G) OAC rule 3745-31-05(C)	

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 6.0 lbs/gallon, as applied.
The volatile organic compound (VOC) content of each cleaning material employed in this emissions unit shall not exceed 6.57 lbs/gallon, as applied.
Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage and VOC content limitations and emission limitations.
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 tons per year (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(3.16 mmBtu/hr wood boiler), P001(sawdust handling system w/fabric filters), R001 (wood furniture coating line), R002 (lacquer paint spray room #2), R003 (quick wood finish line), R004 (wood furniture coating line), all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources, 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.

B. Operational Restrictions

- 1. The maximum coating usage for emissions unit R003 shall not exceed 40 gallons per day.
- 2. The maximum annual coating and cleanup material usage for emissions units R002, R003 and R004 combined shall not exceed the following:

4367 gallons of coatings per year, based on a rolling, 12-month summation of the usage figures.

1324 gallons for cleanup materials per year, based on a rolling, 12-month summation of the usage figures.
- 3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and cleaning material employed;
 - b. The number of gallons of each coating and cleaning material employed;
 - c. The volatile organic compound content of each coating and cleaning material, in pounds per gallon; and
 - d. The total volatile organic compound emission rate for all coatings and cleaning materials, in pounds per day [the sum of (b x c) for each coating and cleanup material employed].
 - e. A record of each organic material employed in this emissions unit indicating whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
- 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 pounds 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. The rolling, 12-month* usage for coating, cleaning, washoff and gluing materials, in gallons from emissions units R002, R003 and R004.
 - h. The rolling, 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place) from emissions units R002, R003 and R004.
- *A rolling, 12-month period includes the previous set of 12 calendar months.
- i. 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 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.
- 4. The permit to operate for this emissions unit R003 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene
 TLV (ug/m3): 188,000
 Maximum Hourly Emission Rate (lbs/hr): 4.58
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1329
 MAGLC (ug/m3): 4,476

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, 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");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of

the application of the "Air Toxic Policy" for the change.

5. The permittee shall collect and record the following information each month for the emissions units identified in term 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 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 emissions 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 and the sum of (f) times (h) for each cleanup material];
 - j. The total combined HAP emissions 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 cleanup material];
 - k. The updated rolling, 12-month summation for each individual HAP emissions, 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 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 Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.
6. The permittee shall collect and record the following information for emissions units R002, R003 and R004 for the purpose of demonstrating compliance with the material usage limitation outlined in sections B.1 and B.2 and the combined annual limit of 17.45 tons per year VOC limitation outlined in section A.1 of this permit:
 - a. The company identification for each coating and cleanup material employed, as applied.
 - b. The number of gallons of each coating and cleanup material employed, as applied.
 - c. The volatile organic compound content of each coating and cleanup material, as applied, in pounds of VOC per gallon.
 - d. The total volatile organic compound emission rate for all coatings and cleanup materials, in tons per year [the sum of (b x c) for each coating and cleaning material employed divided by 2000].

D. Reporting Requirements

1. The permittee shall submit quarterly reports which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY and the updated rolling, 12-month summation of the coating and cleaning material usages for each calendar month from emissions units R002, R003 and R004, combined. These reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous calendar quarter. Exceeding the rolling, 12-month limit is a violation for each day of the last month of each 12 month period in which the limit is exceeded, regardless of whether a compliance plan is submitted.
2. The permittee shall submit quarterly reports which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY for each calendar month from emissions units R001, R002, R003 and R004, combined. These reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous calendar quarter. Exceeding the rolling, 12-month limit is a violation for each day of the last month of each 12 month period in which the limit is exceeded, regardless of whether a compliance plan is submitted.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e VOC contents) and/or any exceedances of the 240 pounds per day VOC emission limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
5. If the facility (R001, R002, R003, and 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.
- 6. The permittee shall submit deviation reports which identify any exceedance of the HAP emission limitations set forth in this Permit to Install. If no exceedances occurred, the permittee shall state so in the report.
 - 7. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing any exceedance of the 40 gallons per day usage limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
 - 8. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
 - 9. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
- E. Testing Requirements**
- 1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):
 - Emission Limitations:
 - Volatile Organic Compound (VOC) emissions shall not exceed 240 pounds per day from coatings only.
 - Volatile Organic Compound (VOC) emissions shall not exceed 17.45 tons per year from emissions units R002, R003 and R004 combined.
 - Applicable Compliance Method:
 - Compliance with the daily and annual organic compound emission limitations shall be based upon the record keeping requirements specified in terms C.1 and C.2 of this permit.
 - For coatings and cleanup, the calculations are demonstrated in the following equation:
 - Pounds of VOC/gallon of material x gallons of material/year divided by 2000 pounds/ton = tons of VOC per year.
 - 2. Usage Limitations:
 - The maximum coating usage for emissions unit R003 shall not exceed 40 gallons per day.
 - The maximum annual coating and cleanup material usage for emissions units R002, R003 and R004 combined shall not exceed the following:
 - 4367 gallons of coatings per year, based on a rolling, 12-month summation of the usage figures.
 - 1324 gallons for cleanup materials per year, based on a rolling, 12-month summation of the usage figures.
 - Applicable Compliance Method:
 - Compliance shall be based upon the record keeping requirements specified in terms C.1 and C.2 of this permit.
 - 3. VOC Content Limitations:
 - The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 6.0 pounds of VOC per gallon of coating, as applied.
 - The volatile organic compound (VOC) content of each cleaning material employed in this emissions unit shall not exceed 6.57 pounds of VOC per gallon of cleanup material, as applied.
 - Applicable Compliance Method:
 - USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical precision statements for Method 24 or 24A.
 - 4. Compliance with the HAP emission limitations in term A.2.e shall be determined by the record keeping in term C.5.
 - 5. Compliance with the emission limit of 24.9 TPY VOC from from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility combined, based on a rolling 12-month summation shall be demonstrated by the recordkeeping requirements in term and condition C.2.
- F. Miscellaneous Requirements**
- 1. This Federally Enforceable Permit limits the potential emissions of volatile 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.5.

2. The following terms and conditions in this permit are federally enforceable: A, B, C.1 - C.3, C.5, D and E.

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

Facility ID: 1431473393 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 Furniture Coating Line - Modification	OAC rule 3745-31-05(A)(3) (14-05454)	Volatile Organic Compound (VOC) emissions shall not exceed 360 pounds per day from coatings only. See terms A.2.a and A.2.b. See sections B.1 and B.2. Volatile Organic Compound (VOC) emissions shall not exceed 17.45 tons per year from emissions units R002, R003 and R004 combined. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). Exempt, see section B.3.
	OAC rule 3745-21-07(G) OAC rule 3745-31-05(C)	Volatile Organic Compound (VOC) emissions shall not exceed 24.9 tons per year from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility, based on a rolling, 12-month summation. See terms A.2.d and A.2.e.

2. Additional Terms and Conditions

- (a) The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 6.0 pounds of VOC per gallon of coating, as applied.
 The volatile organic compound (VOC) content of each cleanup material employed in this emissions unit shall not exceed 6.57 pounds of VOC per gallon of cleanup material, as applied.
 Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by usage and VOC content limitations and emission limitations.
 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 tons per year (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(3.16 mmBtu/hr wood boiler), P001(sawdust handling system w/fabric filters), R001 (wood furniture coating line), R002 (lacquer paint spray room #2), R003 (quick wood finish line), R004 (wood furniture coating line), all de minimus emissions units (as defined in OAC rule 3745-15-05), all emissions units exempt from the requirement to obtain a permit-to-install pursuant to OAC rule 3745-31-03 currently, and future to-be-installed air contaminant sources,

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.

B. Operational Restrictions

1. The maximum coating usage for emissions unit R004 shall not exceed 60 gallons per day.
2. The maximum annual coating and cleanup material usage for emissions units R002, R003 and R004 combined shall not exceed the following:
 - 4367 gallons of coatings per year, based on a rolling, 12-month summation of the usage figures.
 - 1324 gallons for cleanup materials per year, based on a rolling, 12-month summation of the usage figures.
3. The use of photochemically reactive material as defined in OAC rule 3745-21-01(C)(5) is prohibited.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the coating operation:
 - a. The company identification for each coating and cleanup material employed, as applied.
 - b. The number of gallons of each coating and cleanup material employed, as applied.
 - c. The volatile organic compound content of each coating and cleaning material, as applied, in pounds of VOC per gallon.
 - d. The total volatile organic compound emission rate for all coatings and cleaning materials, in pounds per day [the sum of (b x c) for each coating and cleaning material employed].
 - e. A record of each organic material employed in this emissions unit indicating whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
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 pounds 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. The rolling, 12-month* usage for coating, cleaning, washoff and gluing materials, in gallons from emissions units R002, R003 and R004.
 - h. The rolling, 12-month* VOC emission rate in tons per year (in tons, rounded off to one decimal place) from emissions units R002, R003 and R004.

*A rolling, 12-month period includes the previous set of 12 calendar months.
 - i. 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 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.
4. The permit to operate for this emissions unit R004 was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: toluene

TLV (ug/m3): 188,000

Maximum Hourly Emission Rate (lbs/hr): 4.58

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1329

MAGLC (ug/m3): 4,476

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, 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");
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of the evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.
5. The permittee shall collect and record the following information each month for the emissions units identified in term 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 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 emissions 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 and the sum of (f) times (h) for each cleanup material];
 - j. The total combined HAP emissions 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 cleanup material];
 - k. The updated rolling, 12-month summation for each individual HAP emissions, 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 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 Ohio EPA field office or local air agency contact. This information does not have to be kept on a line-by-line basis.
6. The permittee shall collect and record the following information for emissions units R002, R003 and R004 for the purpose of demonstrating compliance with the material usage limitation outlined in sections B.1 and B.2 and the combined annual limit of 17.45 tons per year VOC limitation outlined in section A.1 of this permit:

- a. The company identification for each coating and cleanup material employed, as applied.
- b. The number of gallons of each coating and cleanup material employed, as applied.
- c. The volatile organic compound content of each coating and cleanup material, as applied, in pounds of VOC per gallon.
- d. The total volatile organic compound emission rate for all coatings and cleanup materials, in tons per year [the sum of (b x c) for each coating and cleaning material employed divided by 2000].

D. Reporting Requirements

1. The permittee shall submit quarterly reports which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY and the updated rolling, 12-month summation of the coating and cleaning material usages for each calendar month from emissions units R002, R003 and R004, combined. These reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous calendar quarter. Exceeding the rolling, 12-month limit is a violation for each day of the last month of each 12 month period in which the limit is exceeded, regardless of whether a compliance plan is submitted.
2. The permittee shall submit quarterly reports which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY for each calendar month from emissions units R001, R002, R003 and R004, combined. These reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous calendar quarter. Exceeding the rolling, 12-month limit is a violation for each day of the last month of each 12 month period in which the limit is exceeded, regardless of whether a compliance plan is submitted.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e VOC contents) and/or any exceedances of the 360 pounds per day VOC emission limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
4. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of material(s) emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the exceedance occurs.
5. If the facility (R001, R002, R003, and 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.
6. The permittee shall submit deviation reports which identify any exceedance of the HAP emission limitations set forth in this Permit to Install. If no exceedances occurred, the permittee shall state so in the report.
7. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing any exceedance of the 60 gallons per day usage limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
8. Unless otherwise noted in the above terms, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
9. The permittee shall also submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1of these terms and conditions shall be determined in accordance with the following method(s):

Emission Limitations:
Volatile Organic Compound (VOC) emissions shall not exceed 360 pounds per day from coatings only.

Volatile Organic Compound (VOC) emissions shall not exceed 17.45 tons per year from emissions units R002, R003 and R004 combined.

Applicable Compliance Method:
Compliance with the daily and annual organic compound emission limitations shall be based upon the record keeping requirements specified in terms C.1 and C.2 of this permit.

For coatings and cleanup, the calculations are demonstrated in the following equation:

Pounds of VOC/gallon of material x gallons of material/year divided by 2000 pounds/ton = tons of VOC per year.

2. Usage Limitations:

The maximum coating usage for emissions unit R004 shall not exceed 60 gallons per day.

The maximum annual coating and cleanup material usage for emissions units R002, R003 and R004 combined shall not exceed the following:

4367 gallons of coatings per year, based on a rolling, 12-month summation of the usage figures.

1324 gallons for cleanup materials per year, based on a rolling, 12-month summation of the usage figures.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in terms C.1 and C.2 of this permit.
 3. VOC Content Limitations:

The volatile organic compound (VOC) content of each coating employed in this emissions unit shall not exceed 6.0 pounds of VOC per gallon of coating, as applied.

The volatile organic compound (VOC) content of each cleaning material employed in this emissions unit shall not exceed 6.57 pounds of VOC per gallon of cleanup material, as applied.

Applicable Compliance Method:
USEPA methods 24 and 24A shall be used to determine the VOC content for coatings and cleanup materials. If, pursuant to Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical precision statements for Method 24 or 24A.
 4. Compliance with the HAP emission limitations in term A.2.e shall be determined by the record keeping in term C.5.
 5. Compliance with the emission limit of 24.9 TPY VOC from from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility combined, based on a rolling 12-month summation shall be demonstrated by the recordkeeping requirements in term and condition C.2.
- F. **Miscellaneous Requirements**
1. This Federally Enforceable Permit limits the potential emissions of volatile 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.5.
 2. The following terms and conditions in this permit are federally enforceable: A, B, C.1 - C.3, C.5, D and E.