

Facility ID: 1677011201 Issuance type: Final State Permit To Operate

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

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

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

Facility ID: 1677011201 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) - Spray Booth - wood furniture coating	OAC rule 3745-31-05(C)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G)(2) Volatile organic compound (VOC) emissions shall not exceed 9.22 lbs/hr and 24.9 tons per year. See A.2.a below.
	OAC rule 3745-21-07(G)(2)	See A.2.b below.

2. Additional Terms and Conditions

- (a) Permit to Install 16-02499 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding future applicable requirements under OAC rule 3745-21-15:
 - i. The combined annual coatings usage input rates* and combined emissions of VOC from all the wood furniture manufacturing operations combined (R001) shall not exceed 24.9 tons per year, based upon a rolling, 12-month summation of the monthly emissions..

*The annual coatings usage (VOC) input rates are equivalent to the annual VOC emission rates, based on 100% of the solvent in the coating materials being emitted.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC emissions, upon issuance of this permit.

On any day during which any photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all the coatings and photochemically reactive cleanup materials shall not exceed 8 pounds per hour and 40 pound per day. [OC emissions from any cleanup material that is not a photochemically reactive material shall not be counted towards the 8 lbs/hr and 40 lbs/day limitations.]

B. Operational Restrictions

1. None

C. Monitoring and/or Record Keeping Requirements

1. The permit to install 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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: xylene
 TLV (mg/m3): 434
 Maximum Hourly Emission Rate (lbs/hr): 0.61

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2236
MAGLC (ug/m3): 10337.9

Pollutant: toluene
TLV (mg/m3): 188
Maximum Hourly Emission Rate (lbs/hr): 0.58
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1956.5
MAGLC (ug/m3): 4485.8

2. 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - 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.).
3. 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.
4. 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 its 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 for each day during which any photochemically reactive material is employed in this emissions unit:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed minus the number of gallons of each coating and photochemically reactive cleanup material recovered for disposal;
 - c. the OC content of each coating and photochemically reactive cleanup material, in pounds OC per gallon;
 - d. the total emissions rate for all the coatings and photochemically reactive cleanup materials, in pounds OC per day;
 - e. the total number of hours the emissions unit was in operation;
 - f. the average hourly OC emission rate for all the coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);
 - g. the VOC content of each coating and photochemically reactive cleanup material, in pounds VOC per gallon; and
 - h. the total emissions rate for all coatings and photochemically reactive cleanup materials, in pounds VOC per day.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]
6. The permittee shall collect and record the following information for each day during which no photochemically reactive materials are employed in this emissions unit:
 - a. the company identification for each coating or cleanup material employed;
 - b. documentation on whether or not each material employed (coating and cleanup) was a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);
 - c. the volatile organic compound (VOC) content of each coating, in lbs/gallon, as applied;

- d. the number of gallons of each coating employed minus the number of gallons of each coating recovered for disposal;
 - e. the total VOC emissions from all the coatings employed, in lbs/day, i.e., sum of (c) times (d);
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly VOC emission rate for all the coatings, i.e., (e)/(f), in lbs/hr.
7. The permittee shall collect and record the following information each month for each coating and cleanup material for the entire facility (emissions unit R001, including all exempt sources), combined:
- a. the name and identification number of each coating and cleanup material, as applied;
 - b. the total VOC content, in pounds of VOC per gallon, of each coating and cleanup material, as applied;
 - c. the number of gallons of each coating employed;
 - d. the number of gallons of each cleanup material employed;
 - e. the total VOC emissions from all the coatings and cleanup materials employed, in pounds [the sum of (b) times (c) for all the coatings plus the sum of (b) times (d) for all the cleanup materials]; and
 - f. the rolling, 12-month total VOC input rates and VOC emissions from all the coatings and cleanup materials employed, in tons.
- D. Reporting Requirements**
- 1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month emission limitation for VOC of 24.9 tons.
 - 2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the average hourly mass emission limitation for VOC of 9.22 pounds, and the actual VOC emissions for each such period.
 - 3. The permittee shall submit quarterly deviation (excursion) reports that identify, for the days during which any photochemically reactive material was employed, each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such day.
 - 4. The quarterly deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Conditions of this permit.
 - 5. The permittee shall submit annual reports that specify the actual annual VOC emissions, in tons, for all wood furniture manufacturing operations combined. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- E. Testing Requirements**
- 1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation:

24.9 tpy VOC for (for all the wood furniture operations, combined)

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements established in section C.7 of this permit.
Emission Limitation:

9.22 pounds/hour VOC (for this emissions unit)

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be demonstrated based upon the record keeping requirements established in section C.6 of this permit

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.
Emissions Limitation:

8 pounds per hour of OC emissions for each day during which any photochemically reactive material is employed

40 pounds per day of OC emissions for each day during which any photochemically reactive material is employed

Applicable Compliance Method:

Compliance with the hourly allowable OC emission limitation shall be determined based upon the record keeping requirements specified in Section C.5 of this permit.

Compliance with the daily allowable OC emission limitation shall be determined based upon the record keeping requirements specified in Section C.5 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable OC

emission limitation in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

2. Formulation data or USEPA Method 24 shall be used to determine the VOC content of each coating and cleanup material.

F. **Miscellaneous Requirements**

1. None