

9/15/2008

Certified Mail

Roy Miller
Country View Woodworking, Ltd.
7824 State Route 241
Millersburg, OH 44654

| | |
|-----|----------------------|
| Yes | TOXIC REVIEW |
| No | PSD |
| Yes | SYNTHETIC MINOR |
| No | CEMS |
| No | MACT |
| No | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MAJOR NON-ATTAINMENT |
| No | MODELING SUBMITTED |

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0238000184
Permit Number: P0103738
Permit Type: Initial Installation
County: Holmes

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Holmes County Hub. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,


Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-NEDO

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Country View Woodworking is a finisher of wood furniture. The facility with three booths and two stationary diesel engines for power were constructed in March of 2003. This Federally Enforceable Permit to Install and Operate is for the installation of a fourth wood coating operation, that will result in no increase in VOC emissions from the facility.

3. Facility Emissions and Attainment Status:

The facility is located in Holmes County, which is unclassified for all criteria pollutants. The facility emits VOC from three furniture finishing spray booths and a reciprocated internal combustion engine. The spray booth emissions units are subject to OAC rule 3745-21-07(G)(2). The facility uses only non-photochemically reactive coatings at this time, but wishes to retain the ability to apply PRMs at any time on a case-by-case basis.

The facility is currently permitted as a Synthetic Minor Title V facility for VOC with a federally enforceable PTE of 83.52 tons per year. Potential uncontrolled HAP emissions are less than 1.26 tons per year.

4. Source Emissions:

R004 will be a manual spray coating operation consisting of a booth with dry overspray filters and a manual, air-assisted airless gun to apply topcoats and sealers to wood furniture. Potential uncontrolled VOC emissions are 79.55 tons per year. The facility proposed to limit the VOC emissions from R002, R003 and R004, combined, to 38.67 tons per rolling, 12-month period by limiting the coating VOC content to 5.17 pounds per gallon and the coating usage to 14,750 gallons per rolling, 12-month period. and cleanup material usage to 250 gallons per rolling, 12-month period.

Facility-wide emission summary:

| EU/Pollutant | Title V PTE prior to this FEPTIO | Title V PTE with limits in this FEPTIO |
|----------------------|----------------------------------|--|
| R001 / VOC | 38.17 tpy | 38.17 tpy |
| R002 / VOC | 38.67 tpy (combined R002-, R003) | 38.67 tpy (combined R002, R003) |
| R003 / VOC | 38.67 tpy (combined R002-, R003) | 38.67 tpy (combined R002, R003) |
| R004 / VOC | 79.55 tpy | 38.67 tpy (combined R002, R003 R004) |
| B001 | 3.11 tpy | 3.11 tpy |
| P002 /TOC (plant #1) | 3.57 tpy | 3.57 tpy |
| Total | 163.07 tpy | 83.52 tpy VOC |

5. Conclusion:

The federally enforceable limits on the total coating and cleanup material usage, as a rolling, 12-month summation and the VOC content of the coating and cleanup material in this FEPTIO is sufficient to reduce the facility-wide PTE for VOC to 83.52 tons per year, below the 100 tons Title V threshold.

6. Please provide additional notes or comments as necessary:

Country View Woodworking is a finisher of wood furniture. The facility (Country View Plant #2) with three booths and a stationary diesel engine for power were constructed in March of 2003. The installation of B001, and R001-R003 were considered one project.

This is a FEPTIO for the installation of a fourth coating operation.

For Title V purposes only, the facility also includes Country View Plant #1, which currently has one woodworking shop and one stationary diesel engine. (FAC ID 02-38-00-0215)

In this PTI application, the facility has requested to limit R002-R004 to 38.67 tons per year VOC (no increase in facility-wide allowable). The VOC restrictions in this permit are sufficient to limit the Federally Enforceable Potential to Emit to 83.52 TPY of VOC from R001 through R003 and B001 at plant #2 and P002 at plant #2; below the Title V threshold of 100 TPY of VOC.

(P001 was limited to 2.02 TPY OC in PTI 02-22459 by limiting operating hours. The restriction on operating hours was not federally enforceable and was included only to allow the unit to avoid NOx modeling. Since the BAT limit in this PTI was not federally enforceable, the potential to emit at 8760 hrs of 3.57 tons VOC per year was used when developing the demonstrating the SMTV restrictions in this PTI were sufficient to reduce the PTE for VOC below Title V thresholds.)

BAT requirements are taken from OAC rule 3745-21-15 since BAT should not be less stringent than any RACT rule. (OAC rule 3745-21-015 does not yet apply state-wide, only to the Hamilton County area.) The facility choose to comply with limits on the topcoats and sealers only (OAC rule 3745-21-15(D)(2)). Work practices and reporting requirements from this rule were included in the permit as BAT. 40 CFR 63.803(k) was not included since wash-off with a dip tank is not done at the facility.

Subject to dry filter requirements from OAC rule 3745-17-11(C), which are not yet in the SIP. Qualifying language used.

Still subject to OAC rule 3745-21-07(G)(2) until the SIP is revised. Qualifying language used.

Air Toxics: No listed AT is emitted at greater than 1 tpy.

Fee 1 unit X \$200 (PWR <1000 lbs/hr) = \$200

7. Total Permit Allowable Emissions Summary (for informational purposes only):

| <u>Pollutant</u> | <u>Tons Per Year</u> |
|------------------|----------------------------|
| <u>VOC/OC</u> | <u>79.95 (no increase)</u> |

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Country View Woodworking, Ltd.

Issue Date: 9/15/2008
Permit Number: P0103738
Permit Type: Initial Installation
Permit Description: paint spray booth
Facility ID: 0238000184
Facility Location: Country View Woodworking, Ltd.
7824 State Route 241,
Millersburg, OH 44654
Facility Description: Nonupholstered Wood Household Furniture Manufacturing

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Amysue O'Reilly at Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road or (330)425-9171. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install and Operate
for
Country View Woodworking, Ltd.

Facility ID: 0238000184
Permit Number: P0103738
Permit Type: Initial Installation
Issued: 9/15/2008
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
Country View Woodworking, Ltd.

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103738

Facility ID: 0238000184

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0238000184
Application Number(s): A0035708
Permit Number: P0103738
Permit Description: paint spray booth
Permit Type: Initial Installation
Permit Fee: \$200.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 9/15/2008
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Country View Woodworking, Ltd.
7824 State Route 241
Millersburg, OH 44654

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103738

Facility ID: 0238000184

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0103738
Permit Description: paint spray booth

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

| | |
|-----------------------------------|-------------------|
| Emissions Unit ID: | R004 |
| Company Equipment ID: | Finish Booth No.3 |
| Superseded Permit Number: | |
| General Permit Category and Type: | Not Applicable |



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103738

Facility ID: 0238000184

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103738

Facility ID: 0238000184

Effective Date: To be entered upon final issuance

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103738

Facility ID: 0238000184

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103738

Facility ID: 0238000184

Effective Date: To be entered upon final issuance

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0103738

Facility ID: 0238000184

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. R004, Finish Booth No.3

Operations, Property and/or Equipment Description:

Finish Booth No. 3

a) 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. b)(1)e.

(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. b)(1)c., c)(1), d)(12) and e)(1)

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|--|
| a. | OAC rule 3745-31-05(A)(3) | See b)(2)b., b)(2)d. and c)(3) through c)(12) below. The requirements of this rule also include compliance with the requirements of OAC rules 3745-21-07(G)(2) and 3745-31-05(D). |
| b. | OAC rule 3745-21-07(G)(2) | See b)(2)a. below. |
| c. | OAC rule 3745-31-05(D) | See b)(2)c. and c)(1) below. |
| d. | OAC rule 3745-17-11(C) | See b)(2)e. below. |
| e. | ORC 3704.03(F) | See g)(1) below. |

(2) Additional Terms and Conditions

a. Each day that a photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and from photochemically reactive materials shall not exceed 8 pounds



per hour and 40 pounds per day. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations shall be void.

- b. Each day that photochemically reactive materials [as defined in OAC rule 3745-21-01(C)(5)] are not employed, the volatile organic compound (VOC) emissions from coatings and cleanup materials shall not exceed 18.10 pounds per hour, as a daily average. This limit is based upon the maximum application rate of 3.5 gallons per hour.

The requirement to comply with this emissions limitation only on days photochemically reactive coating or clean up material are employed shall cease on the date the U.S. EPA approves revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, this emissions limitation shall be effective every day the emissions unit is in operation.

- c. The VOC emissions from all VOC-containing materials employed in this emissions unit and in R002 and R003, combined, shall not exceed 38.67 tons per rolling, 12-month period.
- d. The VOC content of topcoats, sealers and strippable spray booth materials shall not exceed:
 - i. 1.8 pounds of VOC per pound of solids, as applied, for any topcoat except for acid-cured alkyd amino conversion varnish topcoats.
 - ii. 2.0 pounds of VOC per pound of solids, as applied, for any acid-cured alkyd amino conversion varnish topcoat.
 - iii. 1.9 pounds of VOC per pound of solids, as applied, for any sealer, except for acid-cured alkyd amino sealers.
 - iv. 2.3 pounds of VOC per pound of solids, as applied, for any acid-cured alkyd amino sealer.
 - v. 0.8 pound of VOC per pound of solids, as applied, for any strippable spray booth material.
- e. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.

On February 1, 2008, OAC rule 3745-17-11 was revised to include paragraph (C), pertaining to control requirements for particulate emissions from surface



coating processes. These control requirements and the associated operational restrictions, monitoring, record keeping, and reporting requirements contained in this permit shall become federally enforceable on the date the U.S. EPA approves paragraph (C) of OAC rule 3745-17-11 as a revision to the Ohio State Implementation Plan.

c) Operational Restrictions

- (1) The maximum annual coating usage for this emissions unit and R002 and R003, combined, shall not exceed 14,750 gallons, based upon a rolling, 12-month summation of the coating usage figures. The maximum annual cleanup material usage (dispensed minus recovered for disposal) for this emissions unit and R002 and R003, combined shall not exceed 125 gallons, based upon a rolling, 12-month summation of the coating usage figures.

The VOC content of each coating shall not exceed 5.17 pounds per gallon, as applied.

The VOC content of each cleanup material shall not exceed 4.08 pounds per gallon.

- (2) The permittee shall install, operate, and maintain a dry particulate filter system for the surface coating operations in accordance with the manufacturer=s recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee. The dry particulate filter shall be employed during all periods of coating application to control particulate emissions.

The permittee shall expeditiously repair the dry particulate filter or otherwise return it to normal operations, as recommended by the manufacturer with any modifications deemed necessary by the permittee, whenever it is determined that the control device is not operating in accordance with these requirements.

- (3) The permit shall prepare and maintain written work practices that define environmentally desirable work practices for each wood furniture manufacturing operation and address each of the work practices in c)(4) through c)(12).

- (4) The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the issuance of this permit, shall be trained upon hiring. All existing personnel, those hired before the issuance of this permit, shall be trained within six months of the issuance of this permit. All personnel shall be given refresher training annually.

The permittee shall develop the plan within 60 days after issuance of this permit and shall maintain a copy of the training program with the work practice implementation plan on site. The training program shall include, at a minimum, the following:

- a. a list of all current personnel by name and job description that are required to be trained;
- b. an outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;



- c. lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - d. a description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
- (5) The permittee source shall prepare and maintain with the work practice implementation plan, a written leak inspection, and maintenance plan that specifies:
 - a. a minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or VOC solvents;
 - b. an inspection schedule;
 - c. methods for documenting the date and results of each inspection and any repairs that were made;
 - d. the timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - i. a first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - ii. final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within 3 months.
- (6) The permittee shall develop a VOC solvent accounting form to record:
 - a. the quantity and type of VOC solvent used each month for washoff and cleaning, as defined in § 63.801 of 40 CFR 63, Subpart JJ;
 - b. the number of pieces washed off, and the reason for the washoff; and
 - c. the quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled on site or disposed off site.
- (7) The permittee shall not use compounds containing more than 8.0 percent, by weight, of VOC to clean spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished.
- (8) The permittee shall use no more than 1.0 gallon of VOC solvent per booth to prepare the surface of the booth prior to applying the booth coating, if the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced.
- (9) The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.



- (10) The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
 - a. to apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - b. for touchup and repair under the following conditions:
 - i. the touchup and repair occurs after completion of the finishing operation; or
 - ii. the touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - c. the conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
 - d. the conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic infeasibility by submitting to the Director a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:
 - i. the production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - ii. the excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- (11) The permittee shall pump or drain all VOC solvent used for line cleaning into a normally closed container.
- (12) The permittee shall collect all VOC solvent used to clean spray guns into a normally closed container.
- d) **Monitoring and/or Recordkeeping Requirements**
 - (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
 - (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the



permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each/any problem identified and the date it was corrected;
 - c. a description of any maintenance and repairs performed; and
 - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit was in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.
- (6) The permittee shall collect and record the following information daily:
 - a. the company identification for each sealer, topcoat and strippable spray booth material employed;
 - b. the type of material, (i.e., acid-cured alkyd amino sealer); and
 - c. the VOC content of each material, as applied, in pounds VOC per pound of solids.

The as applied formulation of the material shall include any thinner, catalyst or other material added prior to application.

- (7) The permittee shall collect and record the following information daily:
 - a. the company identification for each cleanup material employed; and
 - b. the VOC content of each material, in percent by weight.



- (8) The permittee shall collect and record the following information and day the spray booth is being refurbished:
 - a. the company identification for each cleanup material employed;
 - b. the number of gallons of each cleanup material employed, (gallons dispensed minus gallons recovered for proper disposal);
 - c. the VOC content of each cleanup material, in pounds VOC per gallon; and
 - d. the total VOC emissions, in lbs/day.

- (9) The permittee shall collect and record the following information for each day that photochemically reactive coatings, washoff or cleanup material are employed in this emissions unit:
 - a. the company identification for each coating, washoff and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating, washoff and photochemically reactive cleanup material employed;
 - c. the OC content of each coating, washoff and photochemically reactive cleanup material, in pounds OC per gallon;
 - d. the total emissions rate for all coatings, washoff 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 coatings, washoff and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);
 - g. the VOC content of each coating, washoff and photochemically reactive cleanup material, in pounds VOC per gallon; and
 - h. the total emissions rate for all coatings, washoff and photochemically reactive cleanup materials, in pounds VOC per day.

[Note: The coating and washoff information must be for the coatings or washoff 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).]

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, d)(9) will be voided entirely.]

- (10) The permittee shall collect and record the following information for each day that photochemically reactive coatings, washoff or cleanup materials are not employed in this emissions unit:
 - a. the company identification for each coating and washoff employed;



- b. the number of gallons of each coating washoff employed;
- c. the VOC content of each coating and washoff, in lbs/gallon;
- d. the total VOC emission rate for all coatings and washoff, in lbs/day;
- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly VOC emission rate for all coatings and washoff, i.e., (d)/(e), in lbs/hr.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the records required by this shall be kept on a daily basis with no reference to photochemically reactive materials.]

(11) The permittee shall collect and record the following information for each month for this emissions unit:

- a. the company identification for each cleanup material and strippable spray booth materials;
- b. documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
- c. the VOC content of each non-photochemically cleanup material and strippable spray booth materials, in lbs/gallon;
- d. the number of gallons of each material employed minus the number of gallons of cleanup material recovered for disposal; and
- e. the total VOC emissions from all nonphotochemically cleanup materials and strippable spray booth materials employed, in tons per month, i.e., sum of (c) times (d).

[Note: Usage of photochemically reactive cleanup material shall be recorded daily according to d)(9) above.]

[Note: Records of nonphotochemically reactive cleanup material shall be recorded monthly according to d)(9) above. After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, d)(11) shall be revised by voiding any reference to "nonphotochemically reactive". d)(11)b. shall be void.]

(12) The permittee shall collect and record the following information for each month for the emissions unit to demonstrate compliance with the synthetic minor operational restrictions:

- a. the coating usage for each month;
- b. the rolling, 12-month summation of the coating usage;
- c. the cleanup material usage for each month;
- d. the rolling, 12-month summation of the cleanup material usage.



- (13) The permittee shall maintain on site the work practice implementation plan requirements in c)(3) through c)(12) and all records associated with fulfilling the requirements of that plan, including, but not limited to the following:
 - a. records demonstrating that the operator training program required by c)(4) is in place;
 - b. records collected in accordance with the inspection and maintenance plan required by c)(6);
 - c. records associated with the cleaning solvent accounting system required by c)(7);
 - d. records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by c)(10); and
 - e. copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- (14) The permittee shall calculate and record annually the total VOC emissions from all coatings, cleanup materials, washoff and strippable spray booth material, as a sum of the records required in d)(8), d)(9), d)(10), d)(11) and the strippable spray booth material records in d)(13).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. any exceedance of the coating and cleanup material usage restriction, as a rolling, 12-month summation and the actual usage during such period.the probable cause of each deviation (excursion).
 - b. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - c. the magnitude and duration of each deviation (excursion).

*based upon the premise that 100% of the solvent in the coating and cleanup material employed is emitted.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October



(covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit semiannual compliance certifications that state:
 - a. compliant coatings for topcoats and sealers, as applicable, have been used each operating day in the semiannual reporting period, or should otherwise identify the periods of use of noncompliant coatings for topcoats and sealers, as applicable, the reasons for the use of noncompliant coatings, and the amounts and VOC contents of each noncompliant coating used;
 - b. compliant coatings for strippable spray booth materials have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant coatings for strippable spray booth materials were used., the reasons for the use of noncompliant coatings, and the amounts and VOC contents of each noncompliant coating used; and
 - c. the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented.

The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification. This report shall be postmarked or delivered no later than July 30 and January 30 following the end of each 6-month period to the Director (Ohio EPA, Northeast District Office).

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

8 pounds per hour of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in d)(9)f. based upon the record keeping requirements specified in d)(9).
 - b. Emission Limitation:

40 pounds per day of OC emissions for each day that photochemically reactive materials are employed.



Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in d)(9)d. based upon the record keeping requirements specified in d)(9).

c. Emission Limitation:

18.10 pounds VOC emissions per hour for each day that photochemically reactive materials are not employed.

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in d)(10)f. based on the record keeping requirements specified in d)(10).

d. Emission Limitation:

38.67 tons of VOC emissions per year from all VOC containing materials employed in R004, and in R002 and R003 combined.

Applicable Compliance Method:

Compliance shall be demonstrated by the value recorded in d)(14) based on the record keeping requirements specified in d)(8), d)(9), d)(10), d)(11) and d)(13).

e. Emission Limitations:

1.8 pounds of VOC per pound of solids, as applied, for any topcoat except for acid-cured alkyd amino conversion varnish topcoats.

2.0 pounds of VOC per pound of solids, as applied, for any acid-cured alkyd amino conversion varnish topcoat.

1.9 pounds of VOC per pound of solids, as applied, for any sealer, except for acid-cured alkyd amino sealers.

2.3 pounds of VOC per pound of solids, as applied, for any acid-cured alkyd amino sealer.

0.8 pound of VOC per pound of solids, as applied, for any strippable spray booth material.

Applicable Compliance Method:

Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-15(l)(4), the permittee shall determine the composition of the coatings by using a certified product data sheet that provides data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or 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 24 and/or Method 24A.

Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this shall be revised by voiding f)(1)a. and f)(1)b., by voiding the reference to photochemically reactive materials in f)(1)c. and by voiding the reference to d)(8) in f)(1)d.]

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with ORC 3704.03(F)(4)(b) ["Review of New Sources of Air Toxics Emissions, Option A."] was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.