



State of Ohio Environmental Protection Agency

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Columbus, Ohio 43215

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P.O. Box 1049
Columbus, OH 43216-1049

11/26/2008

Dan Mast
Valley View Oak, LLC
8211 Township Road 652
Millersburg, OH 44654

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0238000194
Permit Number: P0084799
Permit Type: Renewal
County: Holmes

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

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

Cc: Ohio EPA-NEDO

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install and Operate
for
Valley View Oak, LLC

Facility ID: 0238000194
Permit Number: P0084799
Permit Type: Renewal
Issued: 11/26/2008
Effective: 11/26/2008
Expiration: 11/26/2013



Air Pollution Permit-to-Install and Operate
for
Valley View Oak, LLC

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Division of Air Pollution Control

Final Permit-to-Install and Operate
Permit Number: P0084799
Facility ID: 0238000194
Effective Date: 11/26/2008

Authorization

Facility ID: 0238000194
Application Number(s): A0015368
Permit Number: P0084799
Permit Description: FEPTIO for woodworking coating operations, six units and woodworking equipment with dust collector.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 11/26/2008
Effective Date: 11/26/2008
Expiration Date: 11/26/2013
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Valley View Oak, LLC
8211 Township Road 652
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



Authorization (continued)

Permit Number: P0084799
Permit Description: FEPTIO for woodworking coating operations, six units and woodworking equipment with dust collector.

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Emissions Unit ID: P001
Company Equipment ID: wood shop
Superseded Permit Number: 02-21819
General Permit Category and Type: Not Applicable

Group Name: Wood Furniture Coating Operation

Emissions Unit ID:	R001
Company Equipment ID:	booth 1
Superseded Permit Number:	02-21819
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R002
Company Equipment ID:	booth 2
Superseded Permit Number:	02-21819
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R003
Company Equipment ID:	booth 3
Superseded Permit Number:	02-21819
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R004
Company Equipment ID:	booth 4
Superseded Permit Number:	02-21819
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R005
Company Equipment ID:	booth 5
Superseded Permit Number:	02-21819
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R006
Company Equipment ID:	booth 6
Superseded Permit Number:	02-21819
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0084799

Facility ID: 0238000194

Effective Date: 11/26/2008

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0084799

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change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

Final Permit-to-Install and Operate

Permit Number: P0084799

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Effective Date: 11/26/2008

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0084799

Facility ID: 0238000194

Effective Date: 11/26/2008

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

Final Permit-to-Install and Operate

Permit Number: P0084799

Facility ID: 0238000194

Effective Date: 11/26/2008

C. Emissions Unit Terms and Conditions



1. P001, wood shop

Operations, Property and/or Equipment Description:

A woodworking shop controlled by a 20,000-acfm Carter Day dust collector and the associated wood waste load out.

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. 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.

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)a, b)(2)b, b)(2)c and c)(2) below.
b.	OAC rule 3745-17-07(B)	None. See b)(2)e.
c.	OAC rule 3745-17-08(B)	None. See b)(2)d.
d.	OAC rule 3745-17-11	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. Particulate emissions (PE) shall not exceed 0.01 grain per dscf of exhaust gas, 1.71 pounds per hour and 7.5 tons per year from the dust collector exhaust.

b. There shall be no visible emissions from the dust collector exhaust.



- c. Visible emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average during load out.
- d. This emissions unit is not located within an area identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Holmes County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- e. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-08(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

- (1) The pressure drop across the dust collector shall be maintained within the manufacturer's recommended range while the emissions unit is in operation, or within the pressure drop range established during the most recent compliance inspection or stack test that determined the emissions unit was in compliance.
- (2) The dust collector shall be operated with a sufficient volumetric flow rate to eliminate visible particulate emissions at the point(s) of capture to the extent possible with good engineering design.
- (3) During any unloading of sawdust into trucks from the dust collector hopper, every attempt shall be made to reduce or control fugitive dust emissions by minimizing the drop height to the truck, utilizing a truck with high side boards, or placing a covering over the discharge chute during the unloading process. The collection efficiency shall be considered adequate if there are no visible particulate emissions of fugitive dust from the fabric tube during wood waste storage silo load out in excess of 20 percent opacity, as a three-minute average.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the dust collector while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the dust collector on a weekly basis.
- (2) When the dust collector is vented outside the building, the permittee shall perform weekly checks for any visible particulate emissions from the exhaust of the dust collector. The presence or absence of any visible emissions from the exhausts of the dust collectors shall be noted in an operations log. If any visible emissions are observed, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log:
 - a. the color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to eliminate the visible emissions.



NOTE: The exhaust from the dust collector for this emissions unit are currently vented back into the building. This is the normal operating mode for this emissions unit.

- (3) The permittee shall record in an operations log any time the telescoping fabric tubes or other drop height reduction tool on the hopper used to load out sawdust are not in use when sawdust load out is in operation.
- (4) The permittee shall maintain copies of these records for a period of at least five years. Those records should be made available for Ohio EPA or their representatives to review during normal working hours.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. All periods of time during which the pressure drop across the dust collector did not comply with the allowable range specified above; and
 - b. All periods of time that the telescoping fabric tubes or other drop height reduction tool were not used during while the sawdust load out was in operation

The quarterly deviations reports shall be submitted in accordance with the Standard Terms and Conditions, Section A of this permit.

- (2) The permittee shall submit semi-annual written reports that (a) identify all days during which any visible particulate emissions were observed from the exhaust of the dust collector serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA Northeast District Office) by January 31 and July 31 of each year and shall cover the previous six-month period.

f) Testing Requirements

- (1) Compliance with the emission limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations: 0.01 gr/dscf and 1.71 pounds per hour of PE

Applicable Compliance Methods:

If required compliance with the PE limitations above shall be determined according Methods 1 - 5, 40 CFR 60, Appendix A.

- b. Emission Limitation: 7.5 tons per year of PE

Applicable Compliance Methods:

Compliance the annual allowable PE limitation may be determined by the following equation:

$$(0.055 \text{ gr/dscf}) \times (20,000 \text{ cfm}) \times (60 \text{ min/hr}) \times (8,760 \text{ hr/yr}) \times (\text{lb}/7,000 \text{ gr}) \times (\text{ton}/2,000 \text{ lb}) \times (1-.99)$$

Where:



0.055 gr/dscf is the emission factor from AP-42, table 10.4-1 version 4/78; and 20,000-cfm is the dust collector flow rate; and 99% is the dust collector control efficiency.

- c. Emission Limitation: There shall be no visible emissions from the dust collector exhaust.

Applicable Compliance Methods:

Compliance with the no visible emission limit for the exhausts from the dust collector shall be determined using Test Method 22-like visible emission observations. (Although Test Method 22 applies to fugitive emissions units, the visible/no visible emissions observation technique of Test Method 22 can be applied to ducted emissions, i.e., Test Method 22-like visible emission observations.)

- d. Emission Limitation: Visible emissions of fugitive dust shall not exceed 20 percent opacity, as a three-minute average during loadout.

Applicable Compliance Method:

Compliance with the visible fugitive emission limitation shall be determine by OAC rule 3745-17-03(B)(3), in accordance with Method 9, as set forth in 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.



2. Emissions Unit Group - Wood Furniture Coating Operation: R001, R002, R003, R004, R005, R006,

EU ID	Operations, Property and/or Equipment Description
R001	Booth 1, wood furniture coating operation with one manual HVLP pump/gun and a booth with overspray filters. Parts are air dried and moved on PowerCart and track system.
R002	Booth 2, wood furniture coating operation with one manual HVLP pump/gun and a booth with overspray filters. Parts are air dried and moved on PowerCart and track system.
R003	Booth 3, wood furniture coating operation with one manual HVLP pump/gun and a booth with overspray filters. Parts flash and then enter a 16 feet halogen tunnel. Parts move on PowerCart and track system.
R004	Booth 4, wood furniture coating operation with one manual HVLP pump/gun and a booth with overspray filters. Parts dry in a electric heated flash tunnel followed by a natural gas tunnel. Parts move on PowerCart and track system.
R005	Booth 5, wood furniture coating operation with one manual HVLP pump/gun and a booth with overspray filters. Parts dry in an natural gas oven.
R006	Booth 6, wood furniture coating operation with one manual HVLP pump/gun and a booth with overspray filters. Parts air dry .

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. d)(6), d)(7), and d)(8).

(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.

b)(1)c, b)(2)d, b)(2)e, d)(4)e, d)(5), e)(2)d, e)(2)e, e)(3), f)(1)d, and f)(1)f.

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) PTI No. 02-21819	See b)(2)b, b)(2)c, and c)(1) below. The requirements of this rule also include compliance with requirements of OAC rule 3745-17-11 (C) and OAC rule 3745-21-07(G)(2).



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-21-07 (G)(2)	Organic compound (OC) emissions from each emissions unit shall not exceed forty (40) pounds per day and eight (8) pounds per hour. See b)(2)a below.
c.	OAC rule 3745-31-05 (D)	See b)(2)d, and b)(2)e below.
d.	OAC rule 3745-17-11 (C)	See c)(1) below.

(2) Additional Terms and Conditions

- a. Each emissions unit becomes subject to OAC 3745-21-07 (G)(2) on any day when any photochemically reactive material, as defined in OAC 374521-01 (C)(5), is employed.

The Organic Compound (OC) emission limitations of eight (8) pounds per hour and forty (40) pounds per day when photochemically reactive materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC 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. On any day during which no photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are employed, the volatile organic compound (VOC) emissions from all the coatings shall not exceed the following:
 - i. For emissions units R001, R002, or R006, 14.34 pounds per hour. [This limit is based upon the maximum application rate of 2.2 gallons per hour.]
 - ii. For emissions units R003, or R005, 16.80 pounds per hour. [This limit is based upon the maximum application rate of 3.3 gallons per hour.]
 - iii. For emissions unit R004, 15.25 pounds per hour. [This limit is based upon the maximum application rate of 3.3 gallons per hour.]

The requirement to comply with these emission limitations only on days when photochemically reactive coating or clean up material are not 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 revised rule is added to the Ohio SIP, these emission limitations shall be effective every day when each emissions unit is in operation.

- c. The VOC content of each coating shall not exceed the following, as applied:
 - i. For emissions units R001, R002, or R006, 6.52 pounds per gallon;
 - ii. For emissions units R003 or R005, 5.09 pounds per gallon; and



- iii. For emissions unit R004, 4.62 pounds per gallon.
 - d. The content of any single hazardous air pollutant (HAP) in any coating or cleanup material shall not exceed 36 percent, by weight, of the VOC portion of the coating or cleanup material, as applied. The content of the combined HAPs in any coating or cleanup material shall not exceed 96 percent, by weight, of the volatile organic compound (VOC) portion of the coating or cleanup material, as applied.
 - e. The volatile organic compound (VOC) emissions from all the coatings and cleanup materials for emissions units R001, R002, R003, R004, R005 and R006, combined, shall not exceed 25.0 tons per rolling, 12-month period.
- c) Operational Restrictions
- (1) All exhaust from each spray booth shall pass through the dry filters whenever the emissions unit is in operation.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain daily records for each emissions unit that document all time periods when any dry filters were not in service when the emissions unit was in operation.
 - (2) The permittee shall collect and record the following information each day for each emissions unit during which any photochemically reactive material is employed:
 - a. The company identification for each coating and cleanup material employed;
 - b. The number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;
 - c. The OC content of each coating and cleanup material, in pounds OC per gallon;
 - d. The total OC emissions from all the coatings and cleanup materials, in pounds per day;
 - e. The total number of hours the emissions unit was in operation; and
 - f. The average hourly OC emission rate for all the coatings and cleanup materials, i.e., (d)/(e), in pounds per hour (average);
 - g. The VOC content of each coating and cleanup material, in pounds VOC per gallon; and
 - h. The total emissions rate for all coatings and 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).]
- (3) The permittee shall collect and record the following information each day for each emissions unit during which no photochemically reactive materials are employed:



- a. The company identification for each coating and 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 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.
- (4) The permittee shall collect and record the following information each month for each emissions unit:
- a. The number of gallons of each cleanup material employed minus the number of gallons of cleanup material recovered for disposal, when no photochemically reactive material are employed;
 - b. The VOC content of each cleanup material, in lbs/gallon when no photochemically reactive material are employed, ;
 - c. The total VOC emissions from all cleanup materials employed, in lbs/month, i.e., sum of (b) times (a), when no photochemically reactive material are employed;
 - d. The actual VOC emissions from all the coatings and cleanup materials employed , in tons [i.e., (the summation of the daily VOC emissions, from d)(2)h, for the calendar month + the summation of the daily VOC emissions, from d)(3)e, for the calendar month + the monthly non-photochemically reactive cleanup material VOC emission from d)(4)c divided by 2000 lbs/ton]; and
 - e. The actual single HAP¹ content and the combined HAPs content for each coating and cleanup material, in percent by weight of the VOC portion of the coating or cleanup material, as applied, (i.e., the pounds of HAP per gallon divided by the pounds of VOC per gallon).
- ¹ A listing of the Hazardous Air Pollutants (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. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line-by-line basis.
- (5) The permittee shall calculate and record the following information each month for emissions units R001 through R006, combined:



- a. The total monthly VOC emissions from all the coatings and cleanup materials employed, in tons (calculated by summing the monthly VOC emissions for R001, R002, R003, R004, R005, and R006);
 - b. The rolling, 12-month VOC emissions from emissions units R001, R002, R003, R004, R005, and R006 combined, in tons.
- (6) The permit to install for this emissions unit and emissions units R001, R002, R003, R004, R005 and R006, combined were 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 one-hour maximum ground level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground Level Concentration (MAGLC) adjusted to reflect the operation hour limitation in this permit. The following summarizes the results of the modeling for the "worst case" pollutant(s) for emissions units R001, R002, R003, R004, R005 and R006, combined:

Compound: n-butyl acetate

TLV (mg/m3): 712.6

Maximum Hourly Emission Rate (lbs/hr): 56.76

Predicted 1-Hour Maximum Ground Level

Concentration (ug/m3): 477

Adjusted MAGLC (ug/m3): 16,968

- (7) 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 still 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.).

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.

- (8) 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.
- (9) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the control devices with any modifications deemed necessary by the permittee during the time period in which the control devices are utilized.
- (10) The permittee shall operate the control devices in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee.
- (11) The permittee shall conduct periodic inspections of the control devices to determine whether the devices are operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of each control device shall be performed at a frequency that is based upon the recommendation of the manufacturer of the control device, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency. In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the control device while the emissions unit is shut down and perform any needed maintenance and repair for the control device to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
- (12) The permittee shall document each inspection of a control device by maintaining a record that includes the date of the inspection, a description of each problem identified and the date it was corrected, a description of the maintenance and repairs performed, and the name of the person who performed the inspection.



- (13) In the event that the control devices are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the control devices shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the control devices are not operating in accordance with such requirements.

e) Reporting Requirements

- (1) The permittee shall notify the Director in writing of any daily record for each emissions unit that showing the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
- (2) The permittee submit quarterly deviation (excursion) reports that identify:
 - a. For each day during which any photochemically reactive material was employed, and OC emissions from the coatings and cleanup materials of each emissions unit exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such day of each emissions unit;
 - b. For each day during which no photochemically reactive materials were employed, and the average VOC emissions from the coatings exceeded the limitations specified in b)(2)b, and the actual average VOC emissions for each such day of each emissions unit;
 - c. For each day during which the VOC content of any coating exceeded the limitations specified in b)(2)c, and the actual VOC content of each such coating employed for each emissions unit;
 - d. All exceedances of the rolling, 12-month VOC emission limitation of 25 tons for emissions units R001, R002, R003, R004, R005, and R006 combined, and the actual VOC emissions for emissions units R001, R002, R003, R004, R005, and R006 combined during such period; and
 - e. All exceedances of the single HAP and/or combined HAPs content limitations specified in b)(2)d for each coating or cleanup material, as applied, and the actual HAP contents of each such coating or cleanup material for each emissions unit of R001, R002, R003, R004, R005, and R006.

The reports contained in this permit shall be submitted in accordance with Standard Terms and Conditions, Section A of this permit.

- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section 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 section 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.

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]



f) Testing Requirements

(1) Compliance with the allowable emission limitations in b)(1) and b)(2) shall be determined in accordance with the following methods:

a. Emissions Limitation:

Eight (8) pounds per hour of OC emissions from each emissions unit 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 d)(2).

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.

b. Emissions Limitation:

Forty (40) pounds per day of OC emissions from each emissions unit for each day during which any photochemically reactive material is employed

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation shall be determined based upon the record keeping requirements specified in d)(2).

c. Emissions Limitation:

For each day during which no photochemically reactive materials are employed, VOC emissions from each emissions unit shall not exceed:

i. For emissions units R001, R002, or R006, 14.34 pounds per. [This limit is based upon the maximum application rate of 2.2 gallons per hour.]

ii. For emissions units R003 or R005, 16.80 pounds per. [This limit is based upon the maximum application rate of 3.3 gallons per hour.]

iii. For emissions unit R004, 15.25 pounds per. [This limit is based upon the maximum application rate of 3.3 gallons per hour.]

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be determined based upon the record keeping requirements specified in d)(3).

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.



d. Emissions Limitation:

25.0 tons of VOC emissions per rolling, 12-month period from all the coatings and cleanup materials for emissions units R001, R002, R003, R004, R005 and R006, combined

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in d)(5).

e. Emissions Limitation:

VOC content for each emissions unit of each coating shall not exceed:

- i. For emissions units R001, R002, or R006, 6.52 pounds per gallon;
- ii. For emissions units R003 or R005, 5.09 pounds per gallon; and
- iii. For emissions unit R004, 4.62 pounds per gallon.

Applicable Compliance Method:

Any determination of VOC content, solids contents, or density of coating material or cleanup 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 3745-21-04(B)(5), the permittee shall determine the composition of the coatings or cleanup material by formulation data supplied by the manufacturer of the coating materials, or from data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 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.

f. Emissions Limitation:

HAP content in any coating or cleanup material shall not exceed:

- i. 36 percent of each single HAP by weight of the VOC portion of the coating or cleanup material, as applied.
- ii. 96 percent of combined HAPs by weight of the VOC portion of the coating or cleanup material, as applied.

Applicable Compliance Method:

Compliance with the HAP content limitations above shall be determined based upon on the record keeping requirements established in d)(4).



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0084799

Facility ID: 0238000194

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- (2) Any determination of the HAP content of any coating or cleanup material shall be based on the coating or cleanup material as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. The permittee shall determine the composition of the coatings or cleanup materials by formulation data supplied by the manufacturer of the coatings or cleanup materials, or from data determined by an analysis of each coating or cleanup material, as applied.
- g) Miscellaneous Requirements
- (1) None.