



State of Ohio Environmental Protection Agency

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

5/1/2009

Certified Mail

Walter Himmelman
Riceland Cabinet, Inc.
11597 E. Lincolnway
Orrville, OH 44667

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0285010312
Permit Number: 02-21941
Permit Type: Initial Installation
County: Wayne

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install 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 public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Daily Recorder. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) 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 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 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
Ohio EPA-NEDO; Canada

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



Permit Strategy Write-Up

PTI 02-21941 for Riceland Cabinet, Inc.

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The facility is located at 11597 E Lincolnway in Orrville, Wayne County, Ohio. The facility manufactures wooden cabinets and operates under SIC 2434.

3. Facility Emissions and Attainment Status:

Riceland Cabinet currently has installation permits for two coating operations. This permit is for the installation of 11 new coating operations and one new oven. With the installation of these 12 currently unpermitted emissions units in this permit, the facility became major for VOC and HAP. Wayne County is classified as attainment for VOC.

4. Source Emissions:

This permit will restrict facility-wide VOC emissions to 80.0 tons per year, and so will reclassify the facility as a synthetic minor for VOC. The facility will remain major for HAP emissions, and so will remain subject to Title V permitting.

5. Conclusion:

After this permit is issued final, Riceland Cabinet will be a synthetic minor facility for VOC emissions and will be classified as major for HAP emissions. Riceland will be subject to Title V permitting.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	80.0
HAP	>25 .0

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
Riceland Cabinet, Inc.

Issue Date: 5/1/2009
Permit Number: 02-21941
Permit Type: Initial Installation
Permit Description: 11 wood coating operations and one oven.
Facility ID: 0285010312
Facility Location: Riceland Cabinet, Inc.
11597 E. Lincolnway,
Orrville, OH 44667
Facility Description: Wood Kitchen Cabinet and Countertop 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 permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. 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 Bridget Byrne 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
for
Riceland Cabinet, Inc.**

Facility ID: 0285010312
Permit Number: 02-21941
Permit Type: Initial Installation
Issued: 5/1/2009
Effective: To be entered upon final issuance



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Air Pollution Permit-to-Install
 for
 Riceland Cabinet, Inc.

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 02-21941

Facility ID: 0285010312

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0285010312
Facility Description: Cabinet Manufacturing
Application Number(s): A0003209
Permit Number: 02-21941
Permit Description: 11 wood coating operations and one oven.
Permit Type: Initial Installation
Permit Fee: \$4,800.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 5/1/2009
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Riceland Cabinet, Inc.
11597 E. Lincolnway
Orrville, OH 44667

of a Permit-to-Install 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 a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: 02-21941

Permit Description: 11 wood coating operations and one oven.

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

Emissions Unit ID:	R016
Company Equipment ID:	IR Oven - Finishing
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: IR oven cured

Emissions Unit ID:	R009
Company Equipment ID:	Basecoat - Finishing
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
Emissions Unit ID:	R010
Company Equipment ID:	Stain - Finishing
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
Emissions Unit ID:	R011
Company Equipment ID:	Sealer - Finishing
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
Emissions Unit ID:	R012
Company Equipment ID:	Topcoat - Finishing
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
Emissions Unit ID:	R013
Company Equipment ID:	Molding Sprayer - Finishing
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	

Group Name: air dried

Emissions Unit ID:	R005
Company Equipment ID:	Stain Booth - Residential
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
Emissions Unit ID:	R006
Company Equipment ID:	Seal Booth - Residential
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Type:	
Emissions Unit ID:	R007
Company Equipment ID:	Topcoat Booth - Residential
Superseded Permit Number:	



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 02-21941

Facility ID: 0285010312

Effective Date: To be entered upon final issuance

Type:	General Permit Category and	Not Applicable
Emissions Unit ID:		R008
Company Equipment ID:		Laminating - Residential
Superseded Permit Number:		
Type:	General Permit Category and	Not Applicable
Emissions Unit ID:		R014
Company Equipment ID:		Glaze Station - Finishing
Superseded Permit Number:		
Type:	General Permit Category and	Not Applicable
Emissions Unit ID:		R015
Company Equipment ID:		Spatter Station - Finishing
Superseded Permit Number:		
Type:	General Permit Category and	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 02-21941

Facility ID: 0285010312

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 2.a), Severability Clause
 - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A. 9., Reporting Requirements
 - (5) Standard Term and Condition A. 10., Applicability
 - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A. 14., Public Disclosure
 - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A. 16., Fees
 - (10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.



(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. **Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. **Compliance Requirements**

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:



- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted



(i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.



No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 02-21941

Facility ID: 0285010312

Effective Date: To be entered upon final issuance

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 02-21941

Facility ID: 0285010312

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B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart JJ, National Emission Standards for Hazardous Air Pollutants for Wood Furniture Manufacturing Operations: R005, R006, R007, R008, R009, R010, R011, R012, R013, R014, R015 and R016. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Ohio EPA Northeast District Office.

The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart JJ. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 1 of 40 CFR Part 63, Subpart JJ. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart JJ, and Subpart A.

REQUIREMENTS FOR A FACILITY-WIDE SYNTHETIC MINOR FOR VOC TO AVOID PSD AND TO AVOID THE INSTALLATION OF ADD-ON CONTROLS TO SATISFY BAT

3. The following emissions units are subject to the requirements specified in B.4 through B.9: R001, R002, R005, R006, R007, R008, R009, R010, R011, R012, R013, R014, R015 and R016.
4. The combined emissions from emissions units R001, R002, R005, R006, R007, R008, R009, R010, R011, R012, R013, R014, R015 and R016 shall not exceed 80.0 tons VOC per rolling 12-months.
5. The maximum amount of VOC employed in the above emissions units shall not exceed 80.0 tons VOC per rolling 12-months.
6. The permittee has sufficient records to document VOC emissions over the past 12 months.
7. The permittee shall monitor and record the following information each month for coatings and cleanup material, as employed, at all of the coating operations identified in B.3:
 - a) the name or identification of each coating and cleanup material employed;
 - b) the VOC content of each coating and cleanup material as employed, in pounds per gallon;
 - c) the amount of each coating and cleanup material employed, in gallons;
 - d) the pounds VOC emitted from the use of each coating and cleanup material, calculated as b) x c) for each such material employed;
 - e) the amount of VOC disposed off-site, as documented in the manifests, in pounds;
 - f) the amount of VOC reclaimed in the still, as documented by records of the still operation, in pounds;
 - g) the tons of VOC emitted each month, calculated by summing the result of d) for each such material employed, subtracting the amounts in e) and f) then multiplying by 1 ton/2000 pounds; and



- h) the VOC emissions over the most recent 12-month period, calculated by summing the tons VOC emitted over the past 12 months.
- 8. Formulation data or USEPA Method 24 (for coatings) shall be used to determine the VOC contents of the coatings and cleanup materials.
- 9. Quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit. The quarterly reports shall identify each month during which the rolling, facility-wide VOC emissions exceeded 80.0 tons. The report shall also include the actual VOC emissions for each rolling, 12-month period.
- 10. TABLE 3 TO SUBPART JJ OF PART 63—SUMMARY OF EMISSION LIMITS

Emission point	Existing source	New source
Finishing Operations:		
(a) Achieve a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied	^a 1.0	^a 0.8
(b) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied):		
—stains	^a 1.0	^a 1.0
—washcoats	^{a,b} 1.0	^{a,b} 0.8
—sealers	^a 1.0	^a 0.8
—topcoats	^a 1.0	^a 0.8
—basecoats	^{a,b} 1.0	^{a,b} 0.8
—enamels	^{a,b} 1.0	^{a,b} 0.8
—thinners (maximum percent VHAP allowable); or	10.0	10.0
(c) As an alternative, use control device; or	^c 1.0	^c 0.8
(d) Use any combination of (a), (b), and (c)	1.0	0.8
Cleaning Operations:		
Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids])	0.8	0.8
Contact Adhesives:		
(a) Use compliant contact adhesives (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied) based on following criteria:		
i. For aerosol adhesives, and for contact adhesives applied to nonporous substrates	^d NA	^d NA
ii. For foam adhesives used in products that meet flammability	1.8	0.2



requirements		
iii. For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements); or	1.0	0.2
(b) Use a control device	^e 1.0	^e 0.2

^aThe limits refer to the VHAP content of the coating, as applied.

^bWashcoats, basecoats, and enamels must comply with the limits presented in this table if they are purchased premade, that is, if they are not formulated onsite by thinning other finishing materials. If they are formulated onsite, they must be formulated using compliant finishing materials, i.e., those that meet the limits specified in this table, and thinners containing no more than 3.0 percent VHAP by weight.

^cThe control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.8 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.

^dThere is no limit on the VHAP content of these adhesives.

^eThe control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.2 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 02-21941

Facility ID: 0285010312

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. R016, IR Oven - Finishing

Operations, Property and/or Equipment Description:

IR Oven – The coatings applied in emissions units R009, R010, R011, R012 and R013 may be cured in this oven.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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 3745-21-07(G)(1)	Emissions of organic compounds (OC) shall not exceed 3 pounds per hour and 15 pounds per day. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)	The Best Available Technology Determination is equivalent to compliance with 40 CFR Part 63, Subpart JJ.
c.	40 CFR Part 63, Subpart JJ [In accordance with 40 CFR Part 63, Subpart JJ, this emissions unit is an existing oven serving some of the coating operations at a furniture manufacturing operation and subject to the emission limitations and work practice standards specified in the subpart.]	Comply with the appropriate limitations in Table 3. See B.10. Comply with the applicable work practice standards in 40 CFR 63.803.
d.	40 CFR 63.1-15	Table 1 to Subpart JJ of 40 CFR Part 63 – Applicability of General Provisions to Subpart JJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

a. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the



requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The requirements of amended OAC rule 3745-21-07 remain unchanged for this emissions unit (i.e., 3 pounds OC per hour and 15 pounds OC per day). However, the rule citation for these requirements shall change to OAC rule 3745-21-07(M)(4) at that time.

c) Operational Restrictions

- (1) See 40 CFR Part 63, Subpart JJ (40 CFR 63.800-819).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information for each day for the oven:
 - a. the total number of hours this emissions unit was in operation.
- (2) See 40 CFR Part 63, Subpart JJ (40 CFR 63.800-819).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day during which the average hourly OC emissions from the oven exceeded 3 pounds per hour, and the actual average hourly OC emissions for each such day; and
 - b. an identification of each day during which the OC emissions from the oven exceeded 15 pounds per day, and the actual OC emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (2) See 40 CFR Part 63, Subpart JJ (40 CFR 63.800-819).

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Emissions of OC shall not exceed 3 pounds per hour and 15 pounds per day.

Applicable Compliance Method:

Compliance shall be determined using the following equations.

$$ED = DE \times 1.5\%$$

$$EH = DE/H$$



where:

ED= OC emissions, in pounds per day, from the oven;

EH= OC emissions, in pounds per hour, from the oven;

DE = daily OC emissions, as calculated in C.2.d)(1)h;

1.5% = percentage of emissions from the coating operations, as calculated in C.2.d)(1)h, which are emitted from the oven; and

H = hours of operation, as recorded in d)(1)a.

b. Emission Limitations:

Comply with the appropriate limitations in Table 3 to 40 CFR Part 63, Subpart JJ

Comply with the applicable work practice standards in 40 CFR 63.803.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the applicable requirements specified in 40 CFR 63.804.

g) Miscellaneous Requirements

(1) None.



2. Emissions Unit Group – Applied coatings may be cured in the IR oven: R009, R010, R011, R012 and R013

EU ID	Operations, Property and/or Equipment Description
R009	manual spray coating operation including a booth with dry filters and one HVLP spray gun. Wood furniture parts manually moved and cured in the IR oven.
R010	manual spray coating operation including a booth with dry filters and one HVLP spray gun. Wood furniture parts manually moved and cured in the IR oven.
R011	manual spray coating operation including a booth with dry filters and one HVLP spray gun. Wood furniture parts manually moved and cured in the IR oven.
R012	manual spray coating operation including a booth with dry filters and one HVLP spray gun. Wood furniture parts manually moved and cured in the IR oven.
R013	automatic inline molding spray coating machine with dry filters, multiple HVLP spray heads. Wood furniture parts manually moved and cured in the IR oven.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) 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 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day. See b)(2)a.
b.	OAC rule 3745-17-11(C)(1) and (2)	See b)(2)b, b)(2)c, c)(1) and c)(2).
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-31-05(A)(3)	The Best Available Technology Determination is equivalent to compliance with 40 CFR Part 63, Subpart JJ.
e.	40 CFR Part 63, Subpart JJ [In accordance with 40 CFR Part 63, Subpart JJ, each emissions unit is an existing coating operation at a furniture manufacturing operation and subject to the emission limitations and work practice standards specified in the subpart.]	Comply with the appropriate limitations in Table 3. See B.10. Comply with the applicable work practice standards in 40 CFR 63.803.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	40 CFR 63.1-15	Table 1 to Subpart JJ of 40 CFR Part 63 – Applicability of General Provisions to Subpart JJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The following terms and conditions shall become void after U.S. EPA approves the rule revision: d)(1), e)(1) and f)(1)a.
- b. 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. The permittee shall install and operate a dry particulate filter system whenever this emissions unit is in operation.

c) Operational Restrictions

- (1) The permittee shall operate and maintain the 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.
- (2) 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) See 40 CFR Part 63, Subpart JJ (40 CFR 63.800-819).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the coating operation to determine compliance with OAC rule 3745-21-07(G)(2):



- a. the company identification for each coating and photochemically reactive cleanup material employed;
- b. the number of gallons of each coating and photochemically reactive cleanup material employed;
- c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
- d. for each day parts are cured in the IR oven, the OC emissions from each coating emitted through the booth, in pounds OC per day, calculated as (b) x (c) x 0.985;
- e. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- f. the amount of VOC reclaimed in the still, as documented by records of the still operation, in pounds;
- g. for each day during which a photochemically reactive material is employed, the organic compound usage rate for all coatings and photochemically reactive cleanup materials, in pounds per day, calculated as the summation of (b) x (c) for each such material;
- h. for each day, the total OC emission rate, in pounds per day, calculated as (g) – (e) – (f);
- i. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
- j. for each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (h)/(i), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of Aphotochemically reactive material@ is based upon OAC rule 3745-21-01(C)(5).]

- (2) For purposes of calculating the OC emission rates for the coating operations and the associated oven (P016), the permittee shall utilize a value of 98.5 as the maximum percentage of the OC employed in the coating operations that are emitted uncontrolled from the emissions units. The remaining 1.5 percent of the OC employed in this emissions unit shall be considered to be the uncontrolled emissions for the associated oven. This Asplit@ of OC emissions between the coating operations and the associated oven is based upon emissions testing conducted on August 17, 2006.
- (3) 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 Ohio EPA Northeast District Office upon request.
- (4) 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.

- (5) 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.
- (6) 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 Ohio EPA Northeast District Office upon request.

The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were 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.

- (7) In the event that the dry particulate filter is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry particulate filter shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the dry particulate filter is not operating in accordance with such requirements.
- (8) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission



incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(9) See 40 CFR Part 63, Subpart JJ (40 CFR 63.800-819).

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:

- a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
- b. for the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or 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 6-month period.

(3) See 40 CFR Part 63, Subpart JJ (40 CFR 63.800-819).

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Emissions of OC shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).



b. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

c. Emission Limitations:

Comply with the appropriate limitations in Table 3 to 40 CFR Part 63, Subpart JJ. Comply with the applicable work practice standards in 40 CFR 63.803.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the applicable requirements specified in 40 CFR 63.804.

g) Miscellaneous Requirements

- (1) None.



3. Emissions Unit Group – Applied coatings are air dried: R005, R006, R007, R008, R014 and R015

EU ID	Operations, Property and/or Equipment Description
R005	manual stain coating operation including a booth with dry filters, and one HVLP spray gun. Wood furniture parts air dried and manually moved.
R006	manual seal coating operation including a booth with dry filters, and one HVLP spray gun. Wood furniture parts air dried and manually moved.
R007	manual top coating operation including a booth with dry filters, and one HVLP spray gun. Wood furniture parts air dried and manually moved.
R008	manual adhesive coating operation including one HVLP spray gun and overspray filters. Wood parts air dried and manually moved.
R014	manual spray coating operation by brush or spray gun. Wood furniture parts manually moved and air dried.
R015	manual spray coating operation by brush or spray gun. Wood furniture parts manually moved and air dried.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) 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 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day. See b)(2)a.
b.	OAC rule 3745-17-11(C)(1) and (2)	See b)(2)b, b)(2)c, c)(1) and c)(2).
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
d.	OAC rule 3745-31-05(A)(3)	The Best Available Technology Determination is equivalent to compliance with 40 CFR Part 63, Subpart JJ.
e.	40 CFR Part 63, Subpart JJ [In accordance with 40 CFR Part 63, Subpart JJ, each emissions unit is an existing coating operation at a furniture manufacturing operation and subject to the emission	Comply with the appropriate limitations in Table 3. See B.10. Comply with the applicable work practice standards in 40 CFR 63.803.



	limitations and work practice standards specified in the subpart.]	
f.	40 CFR 63.1-15	Table 1 to Subpart JJ of 40 CFR Part 63 – Applicability of General Provisions to Subpart JJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio’s State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The requirements of amended OAC rule 3745-21-07 do not apply to emissions units that are installed after February 18, 2008. The following terms and conditions shall become void after U.S. EPA approves the rule revision: d)(1), e)(1) and f)(1)a.
- b. 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. The permittee shall install and operate a dry particulate filter system whenever this emissions unit is in operation.

c) Operational Restrictions

- (1) The permittee shall operate and maintain the 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.
- (2) 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) See 40 CFR Part 63, Subpart JJ (40 CFR 63.800-819).

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for the coating operation to determine compliance with OAC rule 3745-21-07(G)(2):



- a. the company identification for each coating and photochemically reactive cleanup material employed;
- b. the number of gallons of each coating and photochemically reactive cleanup material employed;
- c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
- d. the amount of VOC disposed off-site, as documented in the manifests, in pounds;
- e. the amount of VOC reclaimed in the still, as documented by records of the still operation, in pounds;
- f. for each day during which a photochemically reactive material is employed, the organic compound usage rate for all coatings and photochemically reactive cleanup materials, in pounds per day, calculated as the summation of (b) x (c) for each such material;
- g. for each day, the total OC emission rate, in pounds per day, calculated as (f) – (d) – (e);
- h. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
- i. for each day during which a photochemically reactive material is employed, the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (g)/(h), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of Aphotochemically reactive material@ is based upon OAC rule 3745-21-01(C)(5).]

- (2) 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 Ohio EPA Northeast District Office upon request.
- (3) 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.
- (4) 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.



- (5) 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 Ohio EPA Northeast District Office upon request.

The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were 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) In the event that the dry particulate filter is not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry particulate filter shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the dry particulate filter is not operating in accordance with such requirements.
- (7) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (8) See 40 CFR Part 63, Subpart JJ (40 CFR 63.800-819).



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day; and
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day.

The quarterly deviation reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

- (2) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or 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 6-month period.
- (3) See 40 CFR Part 63, Subpart JJ (40 CFR 63.800-819).

f) Testing Requirements

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

Emissions of OC shall not exceed 8 pounds per hour and 40 pounds per day.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1).
 - b. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 02-21941

Facility ID: 0285010312

Effective Date: To be entered upon final issuance

c. Emission Limitations:

Comply with the appropriate limitations in Table 3 to 40 CFR Part 63, Subpart JJ.
Comply with the applicable work practice standards in 40 CFR 63.803.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the applicable requirements specified in 40 CFR 63.804.

g) Miscellaneous Requirements

(1) None.