



State of Ohio Environmental Protection Agency

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

10/2/2009

Mr. Walter Himmelman
Riceland Cabinet Corp
326 North Hillcrest Dr
Wooster, OH 44691

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0285032001
Permit Number: P0105242
Permit Type: Initial Installation
County: Wayne

Certified Mail

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

Dear Permit Holder:

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

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

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

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

Sincerely,

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

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



Permit Strategy Write-Up

PTI P0105242 for Riceland Cabinet, Inc.

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The facility will locate at 326 North Hillcrest Dr in Wooster, Wayne County, Ohio. The facility manufactures wooden cabinets and operates under SIC 2434.

3. Facility Emissions and Attainment Status:

Riceland Cabinet has applied for permits for a small woodworking operation, with 7 coating operations, including one adhesive booth, one operation for the application of wiping stains and 5 stain/topcoat spray booths. This permit will restrict emissions of VOC to 80 tons per rolling 12 months. This will allow the facility to be a synthetic minor for Title V. Wayne County is classified as attainment for VOC.

4. Source Emissions:

This permit will restrict facility-wide VOC emissions to 80.0 tons per rolling 12-month period. The facility will also restrict emissions of any single HAP to 5.0 tons per rolling 12-month period and emissions of combined HAPs to 12.5 tons per rolling 12-month period. After this permit is final, Riceland Cabinet will have a federally enforceable Permit-to-Install-and-Operate. As an existing facility, Riceland Cabinet will continue to be subject to MACT, subpart JJ under US EPA's once-in-always-in policy.

5. Conclusion:

After this permit is issued final, Riceland Cabinet will be subject to 40 CFR part 63 subpart JJ. Riceland Cabinet will also be a synthetic minor facility to avoid 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
Individual HAP	5.0
Combined HAPs	12.5

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Riceland Cabinet Corp

Issue Date: 10/2/2009
Permit Number: P0105242
Permit Type: Initial Installation
Permit Description: Installation of 7 coating operations and woodworking shop
Facility ID: 0285032001
Facility Location: Riceland Cabinet Corp
326 North Hillcrest Dr,
Wooster, OH 44691
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, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Dennis Bush 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.ohio.gov/dapc



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

**Air Pollution Permit-to-Install and Operate
for
Riceland Cabinet Corp**

Facility ID: 0285032001
Permit Number: P0105242
Permit Type: Initial Installation
Issued: 10/2/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Air Pollution Permit-to-Install and Operate
for
Riceland Cabinet Corp

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105242

Facility ID: 0285032001

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0285032001
Application Number(s): A0038015
Permit Number: P0105242
Permit Description: Installation of 7 coating operations and woodworking shop
Permit Type: Initial Installation
Permit Fee: \$3,200.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 10/2/2009
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Riceland Cabinet Corp
326 North Hillcrest Dr
Wooster, OH 44691

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: P0105242

Permit Description: Installation of 7 coating operations and woodworking shop

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: Woodworking
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Emissions Unit ID: R007
 Company Equipment ID: Stain Wiping
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Group Name: Spray-on coating applications

Emissions Unit ID:	R001
Company Equipment ID:	Booth 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R002
Company Equipment ID:	Booth 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R003
Company Equipment ID:	Booth 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R004
Company Equipment ID:	Booth 4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R005
Company Equipment ID:	Molding Sprayer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R006
Company Equipment ID:	Glue Laminate Spray Station
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105242

Facility ID: 0285032001

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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



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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105242

Facility ID: 0285032001

Effective Date: To be entered upon final issuance

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

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

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

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B. Facility-Wide Terms and Conditions



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.

2. REQUIREMENTS FOR A FACILITY-WIDE SYNTHETIC MINOR FOR VOC AND HAP TO AVOID TITLE V PERMITTING

The following emissions units are subject to the requirements specified in B.3 through B.8: R001, R002, R003, R004, R005, R006 and R007.

3. The combined emissions from emissions units R001, R002, R003, R004, R005, R006 and R007 shall not exceed the following:
 - a) 80.0 tons VOC per rolling, 12-month period;
 - b) 5.0 tons any individual HAP per rolling, 12-month period; and
 - c) 12.5 tons total combined HAPs per rolling, 12-month period.
4. Material employed in cleanup shall not be a VOC or HAP.
5. The maximum amount of VOC employed in the above emissions units shall not exceed 80.0 tons per rolling, 12-months.
6. The permittee lacks sufficient records to document VOC emissions over the past 12 months. Therefore, for the first 12 months of operation, the permittee shall not exceed the following emission limitations:

MONTH	VOC, TONS	INDIVIDUAL HAP, TONS	TOTAL COMBINED HAPs, TONS
1	10.0	1.0	2.0
2	20.0	1.4	3.0
3	30.0	1.8	4.0
4	36.3	2.2	5.0
5	42.6	2.6	6.0



6	50.0	3.0	7.0
7	56.3	3.3	8.0
8	62.6	3.6	9.0
9	70.0	4.0	10.0
10	76.3	4.3	11.0
11	78.6	4.6	12.0
12	80.0	5.0	12.5

7. The permittee shall monitor and record the following information each month for coatings, as employed, at all of the coating operations identified in B.2:
- a) the name or identification of each coating employed;
 - b) the VOC and HAP content of each coating as employed, in pounds per gallon;
 - c) the amount of each coating employed, in gallons;
 - d) the pounds VOC and HAP emitted from the use of each coating, calculated as b) x c);
 - e) the amount of VOC and HAP disposed off-site, as documented in the manifests, in pounds;
 - f) the tons of VOC and HAP emitted each month, calculated by summing the result of d) for each such material employed, subtracting the amounts in e), and then multiplying by 1 ton/2000 pounds; and
 - g) the VOC and HAP emissions over the most recent 12-month period, calculated by summing the tons VOC and HAP emitted over the past 12 months.

Formulation data or USEPA Method 24 (for coatings) shall be used to determine the VOC and HAP contents of the coatings and cleanup materials.

8. 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 and HAP emissions exceeded the allowable amount. The report shall also include the actual VOC and HAP emissions for each rolling, 12-month period.

9. 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 requirements	1.8	0.2
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
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Draft Permit-to-Install and Operate

Permit Number: P0105242

Facility ID: 0285032001

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. P001, Woodworking

Operations, Property and/or Equipment Description:

Woodworking department and dust load-out with cyclone and baghouse

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 3745-17-07(A)	See b)(2)a.
b.	OAC rule 3745-17-11(B)	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(ii)	See b)(2)c.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

b. The uncontrolled mass rate of PE from this emissions unit is less than 10 pounds/hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply pursuant to OAC rule 3745-17-11(A)(2)(b)(ii).

c. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this air contaminant source since the potential to emit (including controls) for particulate emissions is less than ten tons per year.



- c) Operational Restrictions
 - (1) None.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) None.
- e) Reporting Requirements
 - (1) 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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- f) Testing Requirements
 - (1) None.
- g) Miscellaneous Requirements
 - (1) None.



2. R007, Stain Wiping

Operations, Property and/or Equipment Description:

Application of wiping stains with rags

- 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 3745-21-07(G)(2)	Emissions of photochemically reactive organic compounds shall not exceed 8 pounds per hour and 40 pounds per day. See b)(2)a.
b.	OAC rule 3745-31-05(D)(1)(b)	See B.2 – B.8.
c.	40 CFR Part 63, Subpart JJ [In accordance with 40 CFR 63, Subpart JJ, this emissions unit is an existing coating operation at a furniture manufacturing operation and subject to the emissions limitations and work practice standards specified in this subpart.]	Comply with the appropriate limitations in Table 3. See B.9. Comply with the applicable work practice standards in 40 CFR 63.803. See b)(2)b.
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 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), d)(2), e)(1) and f)(1)a.
- b. The permittee shall comply with the applicable emission limitations and work practice standards under 40 CFR Part 63, Subpart JJ, including the following sections:

63.802(a)	VHAP emission limitations for existing sources
63.803(a)	Work practice implementation plan
63.803(b)	Operator training course
63.803(c)	Inspection and maintenance plan
63.803(d)	Cleaning and washoff solvent accounting system
63.803(e)	Chemical composition of cleaning and washoff solvents
63.803(f)	Spray cleaning booths
63.803(g)	Storage requirements
63.803(h)	Application equipment requirements
63.803(i)	Line cleaning
63.803(j)	Gun cleaning
63.803(k)	Washoff operations
63.803(l)	Formulation assessment plan for finishing operations

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall determine whether each coating and cleanup material employed in this coating operation is photochemically reactive per OAC rule 3745-21-01(C)(5) and maintain records of each determination.
- (2) The permittee shall collect and record the following information each day during which any photochemically reactive coatings and/or photochemically reactive cleanup materials are employed in the emissions unit:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the organic compound (OC) content of each coating, in pounds per gallon;



- d. the OC emission rate for all coatings, in pounds per day, calculated as the summation of (b) x (c) for each coating employed;
- e. the amount of OC disposed off-site, as documented in the manifests, in pounds;
- f. the total OC emission rate, in pounds per day, calculated as (d) – (e);
- g. the total number of hours the emissions unit was in operation; and
- h. the average hourly OC emission rate for all coatings, i.e., (f)/(g), in pounds per hour.

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

- (3) The permittee shall comply with the applicable monitoring and record keeping required under 40 CFR Part 63, Subpart JJ, including the following sections:

63.806(a)	Fulfill all record keeping requirements
63.806(b)	Maintain coating records
63.806(c)	Maintain records of averaging coatings, if applicable
63.806(d)	Maintain more coating records
63.806(e)	Maintain records of work practice standards
63.806(h)	Maintain records of compliance certifications
63.806(i)	Maintain records of all other information submitted
63.806(j)	Maintain all records per 40 CFR 63.10(b)(1).

e) Reporting Requirements

- (1) The permittee shall submit the following information in the annual permit evaluation report (PER):
 - 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.
- (2) 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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 63, Subpart JJ, including the following sections:



63.807(a)	Fulfill all reporting requirements
63.807(b)	Submit compliance status reports
63.807(c)	Submit report of previous 6 months operations
63.807(e)	Provide written notification of usage increase

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

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)(2).

b. Emission Limitation:

The permittee shall comply with the applicable emission limitations and work practice standards in 40 CFR Part 63, Subpart JJ.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the requirements under 40 CFR Part 63, Subpart JJ as specified in the subpart, including the following sections:

63.804(a)	Comply with these provisions as follows
63.804(c)	Comply with these provisions as follows
63.804(f)	Initial compliance
63.804(g)	Continuous compliance demonstrations

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group - Spray-on coating applications: R001, R002, R003, R004, R005 and R006

EU ID	Operations, Property and/or Equipment Description
R001	Booth 1 for stain and sealer/topcoat application
R002	Booth 2 for stain and sealer/topcoat application
R003	Booth 3 for stain and sealer/topcoat application
R004	Booth 4 for stain and sealer/topcoat application
R005	Molding sprayer for stain and sealer/topcoat application
R006	Adhesive spray on application

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 3745-21-07(G)(2)	Emissions of organic compounds (OC) shall not exceed 8 pounds per hour and 40 pounds per day. See b)(2)a.
c.	OAC rule 3745-17-11(C)(1) and (2)	See b)(2)b, b)(2)c, c)(1) and c)(2).
d.	OAC rule 3745-31-05(D)(1)(b)	See B.2 – B.8.
e.	40 CFR Part 63, Subpart JJ [In accordance with 40 CFR Part 63, Subpart JJ, this 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.9. Comply with the applicable work practice standards in 40 CFR 63.803. See b)(2)d.
f.	40 CFR 63.1-15	Table 1 to Subpart JJ of 40 CFR Part 63 – Applicability of General Provisions to



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		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), d)(2), 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.
- d. The permittee shall comply with the applicable emissions limitations and work practice standards under 40 CFR Part 63, Subpart JJ, including the following sections:

63.802(a)	VHAP emission limitations for existing sources
63.803(a)	Work practice implementation plan
63.803(b)	Operator training course
63.803(c)	Inspection and maintenance plan
63.803(d)	Cleaning and washoff solvent accounting system
63.803(e)	Chemical composition of cleaning and washoff solvents
63.803(f)	Spray cleaning booths
63.803(g)	Storage requirements
63.803(h)	Application equipment requirements
63.803(i)	Line cleaning
63.803(j)	Gun cleaning
63.803(k)	Washoff operations
63.803(l)	Formulation assessment plan for finishing operations



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.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall determine whether each coating and cleanup material employed in this coating operation is photochemically reactive per OAC rule 3745-21-01(C)(5) and maintain records of each determination.
- (2) The permittee shall collect and record the following information each day during which any photochemically reactive coatings and/or photochemically reactive cleanup materials are employed in the emissions unit:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the organic compound (OC) content of each coating, in pounds per gallon;
 - d. the OC emission rate for all coatings, in pounds per day, calculated as the summation of (b) x (c) for each coating employed;
 - e. the amount of OC disposed off-site, as documented in the manifests, in pounds;
 - f. the total OC emission rate, in pounds per day, calculated as (d) – (e);
 - g. the total number of hours the emissions unit was in operation; and
 - h. the average hourly OC emission rate for all coatings, i.e., (f)/(g), in pounds per hour.

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

- (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.

- (7) 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.
- (8) 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.
- (9) The permittee shall comply with the applicable monitoring and record keeping required under 40 CFR Part 63, Subpart JJ, including the following sections:

63.806(a)	Fulfill all record keeping requirements
63.806(b)	Maintain coating records
63.806(c)	Maintain records of averaging coatings, if applicable
63.806(d)	Maintain more coating records
63.806(e)	Maintain records of work practice standards
63.806(h)	Maintain records of compliance certifications
63.806(i)	Maintain records of all other information submitted
63.806(j)	Maintain all records per 40 CFR 63.10(b)(1).

e) Reporting Requirements

- (1) The permittee shall submit the following information in the annual permit evaluation report (PER):



- 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.
- (2) 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 PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- (3) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 63, Subpart JJ, including the following sections:

63.807(a)	Fulfill all reporting requirements
63.807(b)	Submit compliance status reports
63.807(c)	Submit report of previous 6 months operations
63.807(e)	Provide written notification of usage increase

f) Testing Requirements

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

a. Emission Limitation:

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)(2).

b. Emission Limitation:

The permittee shall comply with the applicable emission limitations and work practice standards in 40 CFR Part 63, Subpart JJ.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the requirements under 40 CFR Part 63, Subpart JJ as specified in the subpart, including the following sections:

63.804(a)	Comply with these provisions as follows
63.804(c)	Comply with these provisions as follows



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105242

Facility ID: 0285032001

Effective Date: To be entered upon final issuance

63.804(f)	Initial compliance
63.804(g)	Continuous compliance demonstrations

g) Miscellaneous Requirements

- (1) None.