



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

11/10/2009

Certified Mail

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

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0285032001  
Permit Number: P0105242  
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:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

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

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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.ohio.gov>.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
Ohio EPA DAPC, Northeast District Office

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





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

**FINAL**

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

Facility ID: 0285032001  
Permit Number: P0105242  
Permit Type: Initial Installation  
Issued: 11/10/2009  
Effective: 11/10/2009





State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

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

**Table of Contents**

Authorization ..... 1

A. Standard Terms and Conditions ..... 3

    1. Federally Enforceable Standard Terms and Conditions ..... 4

    2. Severability Clause ..... 4

    3. General Requirements ..... 4

    4. Monitoring and Related Record Keeping and Reporting Requirements ..... 5

    5. Scheduled Maintenance/Malfunction Reporting ..... 6

    6. Compliance Requirements ..... 6

    7. Best Available Technology ..... 7

    8. Air Pollution Nuisance ..... 7

    9. Reporting Requirements ..... 7

    10. Applicability ..... 8

    11. Construction of New Sources(s) and Authorization to Install ..... 8

    12. Permit-To-Operate Application ..... 9

    13. Construction Compliance Certification ..... 9

    14. Public Disclosure ..... 9

    15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations ..... 9

    16. Fees ..... 9

    17. Permit Transfers ..... 10

    18. Risk Management Plans ..... 10

    19. Title IV Provisions ..... 10

B. Facility-Wide Terms and Conditions ..... 11

C. Emissions Unit Terms and Conditions ..... 15

    1. P001, Woodworking ..... 16

    2. R007, Stain Wiping ..... 18

    3. Emissions Unit Group - Spray-on coating applications: R001, R002, R003, R004, R005 and R006 .... 22





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0105242  
**Facility ID:** 0285032001  
**Effective Date:** 11/10/2009

## Authorization

Facility ID: 0285032001  
Facility Description:  
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  
Issue Date: 11/10/2009  
Effective Date: 11/10/2009

This document constitutes issuance to:

Riceland Cabinet Corp  
326 North Hillcrest Dr  
Wooster, OH 44691

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



State of Ohio Environmental Protection Agency  
 Division of Air Pollution Control

**Final Permit-to-Install**  
**Permit Number:** P0105242  
**Facility ID:** 0285032001  
**Effective Date:** 11/10/2009

## 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:

<b>Emissions Unit ID:</b>	<b>P001</b>
Company Equipment ID:	Woodworking
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R007</b>
Company Equipment ID:	Stain Wiping
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: Spray-on coating applications**

<b>Emissions Unit ID:</b>	<b>R001</b>
Company Equipment ID:	Booth 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R002</b>
Company Equipment ID:	Booth 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R003</b>
Company Equipment ID:	Booth 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R004</b>
Company Equipment ID:	Booth 4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R005</b>
Company Equipment ID:	Molding Sprayer
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>R006</b>
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

**Final Permit-to-Install**  
**Permit Number:** P0105242  
**Facility ID:** 0285032001  
**Effective Date:** 11/10/2009

## **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.



**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

**Final Permit-to-Install**  
**Permit Number:** P0105242  
**Facility ID:** 0285032001  
**Effective Date:** 11/10/2009

## **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 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	<sup>a</sup> 1.0	<sup>a</sup> 0.8
(b) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied):		
—stains	<sup>a</sup> 1.0	<sup>a</sup> 1.0
—washcoats	<sup>a,b</sup> 1.0	<sup>a,b</sup> 0.8
—sealers	<sup>a</sup> 1.0	<sup>a</sup> 0.8
—topcoats	<sup>a</sup> 1.0	<sup>a</sup> 0.8
—basecoats	<sup>a,b</sup> 1.0	<sup>a,b</sup> 0.8
—enamels	<sup>a,b</sup> 1.0	<sup>a,b</sup> 0.8
—thinners (maximum percent VHAP allowable); or	10.0	10.0
(c) As an alternative, use control device; or	<sup>c</sup> 1.0	<sup>c</sup> 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	<sup>d</sup> NA	<sup>d</sup> 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	<sup>e</sup> 1.0	<sup>e</sup> 0.2

<sup>a</sup>The limits refer to the VHAP content of the coating, as applied.

<sup>b</sup>Washcoats, 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.

<sup>c</sup>The 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.

<sup>d</sup>There is no limit on the VHAP content of these adhesives.

<sup>e</sup>The 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

**Final Permit-to-Install**  
**Permit Number:** P0105242  
**Facility ID:** 0285032001  
**Effective Date:** 11/10/2009

## **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) 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 3745-17-07(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) None.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Final Permit-to-Install**  
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- 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) 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 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)(a)	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 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;
  - 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 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**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
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) 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 3745-31-05(D)(1)(a)	See B.2 – B.8.
d.	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.
e.	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. 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 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;
  - 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 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.