



Environmental  
Protection Agency

Ted Strickland, Governor  
Lee Fisher, Lt. Governor  
Chris Korleski, Director

9/7/2010

Jerry Hale  
Custom Millcraft Corporation  
9092 LeSaint Drive  
Fairfield, OH 45014-2241

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1409031000  
Permit Number: P0106711  
Permit Type: Renewal  
County: Butler

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. 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 pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: HCDOES





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Custom Millcraft Corporation**

Facility ID: 1409031000  
Permit Number: P0106711  
Permit Type: Renewal  
Issued: 9/7/2010  
Effective: 9/7/2010  
Expiration: 9/7/2020





Division of Air Pollution Control
Permit-to-Install and Operate
for
Custom Millcraft Corporation

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## Authorization

Facility ID: 1409031000

Application Number(s): A0040044

Permit Number: P0106711

Permit Description: This is an application for a PTIO after the initial PTI 14-05896 issued in final 5/15/2007.  
The PTIO is being processed as a renewal for P001- a woodworking operation, R001 and R002 - two spray booths.

Permit Type: Renewal

Permit Fee: \$0.00

Issue Date: 9/7/2010

Effective Date: 9/7/2010

Expiration Date: 9/7/2020

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Custom Millcraft Corporation  
9092 LeSaint Drive  
Fairfield, OH 45014-2241

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:

Hamilton County Dept. of Environmental Services  
250 William Howard Taft Pkwy.  
Cincinnati, OH 45219-2660  
(513)946-7777

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: P0106711  
Permit Description: This is an application for a PTIO after the initial PTI 14-05896 issued in final 5/15/2007. The PTIO is being processed as a renewal for P001- a woodworking operation, R001 and R002 - two spray booths.

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:             | Wood working operation      |
| Superseded Permit Number:         | 14-05896                    |
| General Permit Category and Type: | Not Applicable              |
| <b>Emissions Unit ID:</b>         | <b>R001</b>                 |
| Company Equipment ID:             | Lacquer coating spray booth |
| Superseded Permit Number:         | 14-05896                    |
| General Permit Category and Type: | Not Applicable              |
| <b>Emissions Unit ID:</b>         | <b>R002</b>                 |
| Company Equipment ID:             | Adhesive spray booth        |
| Superseded Permit Number:         | 14-05896                    |
| General Permit Category and Type: | Not Applicable              |

## **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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. 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 Hamilton County Dept. of Environmental Services 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<sup>1</sup> 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 emissions 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.

**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

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<sup>1</sup> Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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.

## **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.

## **C. Emissions Unit Terms and Conditions**



1. P001, Wood working operation

Operations, Property and/or Equipment Description:

Woodworking Operations

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 operation(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 are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) and Particulate matter 10 microns and less in diameter (PM10) emissions shall not exceed 0.17 pound per hour (lb/hr) and 0.75 ton per year (TPY).  The hourly and annual emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly and annual records are required to demonstrate compliance with these limitations.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A).
b.	OAC rule 3745-17-07(A)	See b)(2)a.
c.	OAC rule 3745-17-07(B)	Exempt per OAC rule 3745-17-07(B)(11)(e).
d.	OAC rule 3745-17-11	The emissions limitation established by



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		OAC rule 3745-17-11 is less stringent than OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. Visible particulate emissions from the stack for emissions unit P001 shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- b. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a baghouse and compliance with the emissions limitations.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emissions incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

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

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 permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (2) The permittee shall identify in the PER the following:
- a. all weeks during which any visible particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.

f) Testing Requirements

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

Emission Limitation:

PE/PM10 emissions shall not exceed 0.17 lb/hr and 0.75 TPY.

Applicable Compliance Method:

Amount of sawdust collected (in cubic yards) multiplied by 300 lbs/yd<sup>3</sup> divided by 99% (the control efficiency of the baghouse) = Amount of sawdust produced. Amount of sawdust produced multiplied by one minus 99% = Amount of particulate (sawdust) emitted.

If required, compliance with the hourly PE limitation shall be demonstrated through an emissions source test performed in accordance with the requirements of 40 CFR Part 60, Appendix A, Methods 1 - 5.

Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average.

Applicable Compliance Method:

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

- (1) None.



2. R001, Lacquer coating spray booth

Operations, Property and/or Equipment Description:

Lacquer Coating Spray Booth

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(3)
  - (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 operation(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 are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 195 pounds per day (lbs/day) from coatings only.</p> <p>See b)(2)a. and b)(2)b.</p> <p>The daily emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with this limitation.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).</p>
b.	OAC rule 3745-31-05(D) Voluntary restriction to avoid OAC rule 3745-21-15	VOC emissions shall not exceed 24.9 TPY from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		based on a rolling, 12-month summation. See b)(2)d. and c)(1).
c.	OAC rule 3745-21-15	Exempt: The facility-wide total VOC emissions are restricted to 24.9 TPY.

(2) Additional Terms and Conditions

- a. The VOC content of each coating employed in this emissions unit shall not exceed 6.49 pounds per gallon, as applied.
- b. The VOC content of each cleaning material employed in this emissions unit shall not exceed 5.62 pounds per gallon, as applied.
- c. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage, VOC content, and emission limitations.
- d. The total allowable VOC emissions from emissions units R001 (Lacquer Coating Spray Booth) and R002 (Adhesive Spray Booth) shall not exceed 24.9 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.

c) Operational Restrictions

- (1) The maximum annual coating and cleaning material usage for emissions units R001 and R002 combined shall not exceed 3,843 gallons for coatings and 2,482 gallons for adhesives, and 2,190 gallons for cleaning materials, based on a rolling, 12-month summation of the usage figures.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units R001 and R002 combined:
  - a. The name and identification number of each coating, cleaning, washoff and gluing material employed. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical

substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.

- b. The volume, in gallons, of each coating, cleaning, washoff and gluing material employed.
- c. The VOC content of each coating, cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied.
- d. The amount of VOC emitted for all coating, cleaning, washoff and gluing materials employed, in pounds per month (b x c).
- e. The rolling, 12-month\* usage for coating, cleaning, washoff and gluing materials, in gallons.
- f. The rolling, 12-month\* VOC emission rate in tons per year (in tons, rounded off to one decimal place).

\*A rolling, 12-month period includes the previous set of 12 calendar months.

- g. Monthly records shall be completed within 15 days following the end of each calendar month and shall include the updated rolling, 12-month VOC emission rate.

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

- (2) The permittee shall maintain for this facility all purchase orders and invoices of VOC containing materials. The permittee shall retain such purchase orders and invoices for at least five years from their date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.
- (3) The permit to install and operate for emissions units R001 and R002 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (ug/m3): 188,400

Maximum Hourly Emission Rate (lb/hr): 1.86

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 82

MAGLC (ug/m3): 4,486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- 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 permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (2) The permittee shall include in the annual Permit Evaluation Report (PER) any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made.
  - (3) The permittee shall submit quarterly reports to the Hamilton County Department of Environmental Services which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY and the updated rolling, 12-month summation of the coating, adhesive, and cleaning material usages for each calendar month from emissions units R001 and R002, combined. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.) Exceeding the rolling, 12-month limitation is a violation for each day of the last month of each 12 month period in which the limitation is exceeded, regardless of whether a compliance plan is submitted.
  - (4) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e VOC contents) and/or any exceedances of the 195 pounds per day VOC

emission limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

- (5) If the facility (R001 and R002) has a rolling, 12 month record that exceeds 24.9 tons of VOC from combined operations associated with the manufacture of wood furniture, or wood furniture components, the permittee shall submit the following:
- a. Within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Hamilton County Department of Environmental Services that the VOC emission limitation was exceeded;
  - b. Within three months after the end of that rolling, 12-month period in which the exceedance occurred, a compliance plan to the Hamilton County Department of Environmental Services to comply with the presumptive RACT standards specified within USEPA document EPA-453/R-96-007 "Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations" (April 1996). Any divergence from the presumptive RACT standards and the model rule provided within that document shall be described at the time of the submittal of the 3-month compliance plan. Compliance with the presumptive RACT standards is to be achieved within 12 months after the rolling, 12-month period exceedance, unless otherwise requested by the permittee and approved by USEPA as a revision to Ohio's state implementation plan for ozone;
  - c. Exceeding the 24.9 TPY VOC emission limitation is a violation for each day of the last month of each 12 month period in which the 24.9 TPY emission limitation is exceeded, regardless of whether a compliance plan is submitted.

f) **Testing Requirements**

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

Emission Limitation:

195 lbs of VOC/day from coatings only.

Applicable Compliance Method:

For coatings, the calculations are demonstrated in the following equation: VOC content (in lbs of VOC/gallon) \* material usage rate (gallons/day) = pounds of VOC per day.

VOC Content Limitations:

6.49 lbs/gallon for coatings, and 5.62 lbs/gallon for cleaning materials.

Applicable Compliance Method:

OAC rule 3745-21-10(B) shall be used to determine the density of the VOC contents of the coatings, cleaning materials, washoff materials, and gluing materials. If pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or Method 24A cannot be used, the permittee shall notify the administrator of USEPA and

shall use formulation data for the material to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- (2) Compliance with the material usage limitations specified in c)(1) shall be based upon the record keeping requirements specified in d)(1) of this permit.
- (3) Compliance with the emission limitation of 24.9 TPY VOC from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility combined, based on a rolling 12-month summation shall be demonstrated by the recordkeeping requirements in d)(1).

g) **Miscellaneous Requirements**

- (1) This permit limits the potential emissions of volatile organic compounds from the wood furniture finishing processes and associated cleaning, washoff and gluing processes located at this facility to no more than 24.9 TPY during any rolling, 12-month period. Should VOC emissions from the wood finishing processes and associated cleaning, washoff and gluing processes exceed 24.9 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days. See e)(4).



3. R002, Adhesive spray booth

Operations, Property and/or Equipment Description:

Adhesive Spray Booth

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. d)(3)
  - (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 operation(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 are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 97 pounds per day (lbs/day) from coatings only.</p> <p>See b)(2)a. and b)(2)b.</p> <p>The daily emission limitation outlined is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with this limitation.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D)</p>
b.	OAC rule 3745-31-05(D) Voluntary restriction to avoid OAC rule 3745-21-15	VOC emissions shall not exceed 24.9 TPY from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility,



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		based on a rolling, 12-month summation.  See b)(2)d. and c)(1).
c.	OAC rule 3745-21-15	Exempt: The facility-wide total VOC emissions are restricted to 24.9 TPY.

(2) Additional Terms and Conditions

- a. The VOC content of each coating employed in this emissions unit shall not exceed 5.03 pounds per gallon, as applied.
- b. The VOC content of each cleaning material employed in this emissions unit shall not exceed 5.62 pounds per gallon, as applied.
- c. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the usage, VOC content, and emission limitations.
- d. The total allowable VOC emissions from emissions units R001 (Lacquer Coating Spray Booth) and R002 (Adhesive Spray Booth) shall not exceed 24.9 TPY based on a rolling, 12-month summation. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.

c) Operational Restrictions

- (1) The maximum annual coating and cleaning material usage for emissions units R001 and R002 combined shall not exceed 3,843 gallons for coatings and 2,482 gallons for adhesives, and 2,190 gallons for cleaning materials, based on a rolling, 12-month summation of the usage figures.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units R001 and R002 combined:
  - a. The name and identification number of each coating, cleaning, washoff and gluing material employed. "Coating" means a protective, decorative, or functional material applied in a thin layer to a surface. Such materials include, but are not limited to, paints, topcoats, varnishes, sealers, stains, washcoats, basecoats, inks and temporary protective coatings. "Cleaning material" means organic solvent used to remove coating materials from equipment used in wood furniture manufacturing operations. "Washoff material" means organic solvent

used to remove coating from a substrate. "Gluing material" means any chemical substance that is applied for the purpose of bonding two surfaces together other than by mechanical means.

- b. The volume, in gallons, of each coating, cleaning, washoff and gluing material employed.
- c. The VOC content of each coating, cleaning, washoff and gluing material, in pounds of VOC per gallon, as applied.
- d. The amount of VOC emitted for all coating, cleaning, washoff and gluing materials employed, in pounds per month (b x c).
- e. The rolling, 12-month\* usage for coating, cleaning, washoff and gluing materials, in gallons.
- f. The rolling, 12-month\* VOC emission rate in tons per year (in tons, rounded off to one decimal place).

\*A rolling, 12-month period includes the previous set of 12 calendar months.

- g. Monthly records shall be completed within 15 days following the end of each calendar month and shall include the updated rolling, 12-month VOC emission rate.

The records shall be maintained for five years, and upon request the permittee shall submit such records to the appropriate Ohio EPA District Office or local air agency.

- (2) The permittee shall maintain for this facility all purchase orders and invoices of VOC-containing materials. The permittee shall retain such purchase orders and invoices for at least five years from their date of issuance. Upon request, the permittee shall make available to the Director of the Ohio EPA, or an authorized representative of the Director, such purchase orders and invoices for use in confirming the general accuracy of the records maintained and the reports submitted regarding material usage.
- (3) The permit to install for emissions units R001 and R002 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene  
TLV (ug/m<sup>3</sup>): 188,400  
Maximum Hourly Emission Rate (lb/hr): 1.86

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 82  
MAGLC (ug/m3): 4,486

The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- 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 permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
  - (2) The permittee shall include in the annual Permit Evaluation Report (PER) any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made.
  - (3) The permittee shall submit quarterly reports to the Hamilton County Department of Environmental Services which specify the updated rolling, 12-month summation of volatile organic compound emissions in TPY and the updated rolling, 12-month summation of the coating, adhesive, and cleaning material usages for each calendar month from emissions units R001 and R002, combined. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively.) Exceeding the rolling, 12-month limitation is a violation for each day of the last month of each 12 month period in which the limitation is exceeded, regardless of whether a compliance plan is submitted.

- (4) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings and/or cleaning materials (i.e VOC contents) and/or any exceedances of the 97 pounds per day VOC emission limitation. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
- (5) If the facility (R001 and R002) has a rolling, 12 month record that exceeds 24.9 tons of VOC from combined operations associated with the manufacture of wood furniture, or wood furniture components, the permittee shall submit the following:
- a. Within 30 days after the end of that rolling, 12-month period in which the exceedance occurred, a notification to the Hamilton County Department of Environmental Services that the VOC emission limitation was exceeded;
  - b. Within three months after the end of that rolling, 12-month period in which the exceedance occurred, a compliance plan to the Hamilton County Department of Environmental Services to comply with the presumptive RACT standards specified within USEPA document EPA-453/R-96-007 "Control of Volatile Organic Compound Emissions from Wood Furniture Manufacturing Operations" (April 1996). Any divergence from the presumptive RACT standards and the model rule provided within that document shall be described at the time of the submittal of the 3-month compliance plan. Compliance with the presumptive RACT standards is to be achieved within 12 months after the rolling, 12-month period exceedance, unless otherwise requested by the permittee and approved by USEPA as a revision to Ohio's state implementation plan for ozone;
  - c. Exceeding the 24.9 TPY VOC emission limitation is a violation for each day of the last month of each 12 month period in which the 24.9 TPY emission limitation is exceeded, regardless of whether a compliance plan is submitted.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:
- Emission Limitation:
- 97 lbs of VOC/day from coatings only.
- Applicable Compliance Method:
- For coatings, the calculations are demonstrated in the following equation:
- VOC content (in lbs of VOC/gallon) \* material usage rate (gallons/day) = pounds of VOC per day.
- VOC Content Limitations:
- 5.03 lbs/gallon for coatings, and 5.62 lbs/gallon for cleaning materials.

Applicable Compliance Method:

OAC rule 3745-21-10(B) shall be used to determine the density of the VOC contents of the coatings, cleaning materials, washoff materials, and gluing materials. If pursuant to 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or Method 24A cannot be used, the permittee shall notify the Administrator of USEPA and shall use formulation data for the material to demonstrate compliance until USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

- (2) Compliance with the material usage limitations specified in c)(1) shall be based upon the record keeping requirements specified d)(1) of this permit.
- (3) Compliance with the emission limitation of 24.9 TPY VOC from all wood finishing processes and associated cleaning, washoff and gluing processes located at this facility combined, based on a rolling 12-month summation shall be demonstrated by the recordkeeping requirements in d)(1).

g) Miscellaneous Requirements

- (1) This permit limits the potential emissions of volatile organic compounds from the wood furniture finishing processes and associated cleaning, washoff and gluing processes located at this facility to no more than 24.9 TPY during any rolling, 12-month period. Should VOC emissions from the wood finishing processes and associated cleaning, washoff and gluing processes exceed 24.9 TPY during any rolling 12-month period, this facility should notify the Hamilton County Department of Environmental Services within 30 days. See e)(4).