Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Certified Mail

3/22/2011

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

JEFFREY LEVINE
M21 INDUSTRIES, LLC
PO BOX 4044
DAYTON, OH 45401-4044

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0857043219
Permit Number: P0107315
Permit Type: Renewal
County: Montgomery

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 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 Josh Mandel," 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 Regional Air Pollution Control Agency at (937)225-4435 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, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: RAPCA

Response to Comments

Response to comments for: Permit-To-Install and Operate

Facility ID:	0857043219
Facility Name:	M21 INDUSTRIES, LLC
Facility Description:	millwork
Facility Address:	721 SPRINGFIELD ST Dayton, OH 45403-1250 Montgomery County
Permit #:	P0107315, Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Dayton Daily News on 02/14/2011. The comment period ended on 03/16/2011.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

No Comments Received.

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
M21 INDUSTRIES, LLC

Facility ID:	0857043219
Permit Number:	P0107315
Permit Type:	Renewal
Issued:	3/22/2011
Effective:	3/22/2011
Expiration:	2/2/2016

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
M21 INDUSTRIES, LLC

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Authorization

Facility ID: 0857043219
Application Number(s): A0040786
Permit Number: P0107315
Permit Description: Renewal permit for 2 wood furniture coating booths. Facility is requesting lower emissions limits to avoid Title V permitting and MACT applicability.
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 3/22/2011
Effective Date: 3/22/2011
Expiration Date: 2/2/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

M21 INDUSTRIES, LLC
721 SPRINGFIELD ST
Dayton, OH 45403-1250

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:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0107315
Permit Description: Renewal permit for 2 wood furniture coating booths. Facility is requesting lower emissions limits to avoid Title V permitting and MACT applicability.

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

Group Name: K001 and K002

Emissions Unit ID:	**K001**
Company Equipment ID:	Main Spray Booth 1
Superseded Permit Number:	08-04297
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K002**
Company Equipment ID:	Contact Adhesive Spray Booth
Superseded Permit Number:	08-04297
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 Regional Air Pollution Control Agency 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[1] 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.

[1] 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).

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

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

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

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

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) 2, 3, 4, 5, 6, 7, 8 and 10.

2. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act, from this facility shall not exceed 9.9 tons per year (TPY) for any individual HAP and 24.9 TPY for the combination of all HAPs, based upon rolling, 12-month summations.

   To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Single HAP Emissions (Tons)	Maximum Allowable Cumulative Combined HAP Emissions (Tons)
1	2.5	6.3
1-2	5.0	12.5
1-3	7.5	18.8
1-4	9.9	24.9
1-5	9.9	24.9
1-6	9.9	24.9
1-7	9.9	24.9
1-8	9.9	24.9
1-9	9.9	24.9
1-10	9.9	24.9
1-11	9.9	24.9
1-12	9.9	24.9

After the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitations for single HAP and combined HAP shall be based upon a rolling, 12-month summation of the single HAP and combined HAP emissions each.

3. Facility wide volatile organic compound (VOC) emissions from cleanup materials shall not exceed 1.4 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative VOC Cleanup Emissions (Tons)
1	0.4
1-2	0.7
1-3	1.1
1-4	1.4
1-5	1.4
1-6	1.4
1-7	1.4
1-8	1.4
1-9	1.4
1-10	1.4
1-11	1.4
1-12	1.4

   After the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the VOC emissions.

4. Facility wide VOC inputs from cleanup materials shall not exceed 1.4 tons per year, based upon a rolling, 12-month summation of the monthly emissions.

   To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the VOC and OC input levels specified in the following table:

Month(s)	Maximum Allowable Cumulative VOC Cleanup Input (Tons)
1	0.4
1-2	0.7
1-3	1.1
1-4	1.4
1-5	1.4
1-6	1.4
1-7	1.4
1-8	1.4
1-9	1.4
1-10	1.4
1-11	1.4
1-12	1.4

After the first 12 calendar months following the issuance of this permit, compliance with the annual cleanup material VOC input limitation shall be based upon a rolling, 12-month summation of the cleanup material VOC input.

5. The permittee shall collect and record the following information each month for the entire facility:

   a) The name and identification number of each coating and cleanup material employed.

   b) The individual hazardous air pollutant (HAP)* content for each HAP of each coating and cleanup material, in pounds of individual HAP per gallon, as applied.

   c) The total combined HAPs content of each coating and cleanup material, in pounds of combined HAPs per gallon, as applied [the sum of all the individual HAP contents from B.5.b)].

   d) The number of gallons of each coating and cleanup material employed.

   e) The total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons per month [for each HAP, the sum of B.5.b) times B.5.d) for each coating and cleanup material.

   f) The total combined HAPs emissions from all coating materials and cleanup materials employed, in tons per month [the sum of B.5.c) times B.5.d) for each coating and cleanup material.

g) Beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the total individual HAP emissions for each HAP from all coating materials and cleanup materials employed, in tons.

h) Beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the total combined HAPs emissions from all coating materials and cleanup materials employed, in tons.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative individual HAP emissions for each HAP and the total combined HAP emissions for each calendar month.

* A listing of the Hazardous Air Pollutants (HAPs) can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA District Office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or cleanup materials. This information does not have to be kept on a line by line basis.

6. The permittee shall collect and record the following information for each month for the facility:

a) The company identification of each cleanup material employed.

b) The number of gallons of each cleanup material employed.

c) The VOC content of each cleanup material employed, in pounds per gallon.

d) The total VOC emissions each from all cleanup materials employed, in pounds [i.e., sum of 6.b) times 6.c) for each cleanup material employed].

e) Beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of VOC emissions from cleanup materials.

f) The total VOC input from all cleanup materials employed, in pounds [i.e., sum of 6.b) times 6.c) for each cleanup material employed].

g) Beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of VOC inputs from cleanup materials.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC emissions from cleanup materials for each calendar month.

In addition, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC inputs from cleanup materials for each calendar month.

7. The permittee shall submit quarterly deviation (excursion) reports that identify:

a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

(1) all exceedances of the rolling, 12-month emission limitation for each individual HAP and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;

(2) all exceedances of the rolling, 12-month emission limitation for combined HAP and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;

(3) all exceedances of the rolling, 12-month emission limitation for VOC emissions from cleanup materials and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels; and

(4) all exceedances of the rolling, 12-month limitation for VOC input from cleanup materials and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative input levels.

b) the probable cause of each deviation (excursion);

c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

8. The permittee shall also submit annual reports that specify the total individual HAP and combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

9. 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.

10. Compliance with the emission limitations in B.2 shall be determined in accordance with the following methods:

a) <u>Emissions Limitation:</u>

Individual HAP emissions from this facility shall not exceed 9.9 TPY, based upon a rolling, 12-month summation.

<u>Applicable Compliance Method:</u>

Compliance shall be based on the record keeping specified in B.5 for each individual HAP.

b) Emissions Limitation:

Combined HAP emissions from this facility shall not exceed 24.9 TPY, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in B.5 for combined HAP.

c) Emissions Limitation:

Facility wide VOC emissions from cleanup materials shall not exceed 1.4 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in B.6.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - K001 and K002: K001, K002,

EU ID	Operations, Property and/or Equipment Description
K001	Main Spray Booth 1
K002	Contact 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. b)(1)e, d)(8) through d)(11) and e)(4).

(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. b)(1)a, b)(2)c, c)(1), d)(1), e)(1)a.i, e)(1)a.ii and f)(1)a.

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) and OAC rule 3745-31-05(D) (synthetic minor to avoid TV)	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 5.7 tons per rolling 12-month period, excluding cleanup. See b)(2)c.
b.	OAC rule 3745-21-07(G)(2)	Organic compound (OC) emissions from this emissions unit shall not exceed 8 lbs/hr and 40 lbs/day. See b)(2)a.
c.	OAC rule 3745-17-11(C)	See b)(2)b, c)(2) and c)(3).
d.	40 CFR Part 63, Subpart JJ	See b)(2)d.
e.	ORC 3704.03(F) and OAC rule 3745-114-01	See d)(8) through d)(11) and e)(4).

(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 following terms and conditions shall become void after U.S. EPA approves the rule revision:

i. b)(1)b., d)(7), e)(1)a.iii, e)(1)a.iv, f)(1)b, and f)(1)c.

The emission limitations and control requirements from the amended 21-07 rule, and the associated operational restrictions and the monitoring, record keeping, and reporting requirements contained in this permit, shall become federally enforceable on the date the U.S. EPA approves the revised OAC rule 3745-21-07 as a revision to the Ohio State Implementation Plan. The following terms shall become federally enforceable after U.S. EPA approves the rule revision:

ii. None

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 VOC emissions from this emissions unit shall not exceed 5.7 tons per year, excluding cleanup, based upon a rolling, 12-month summation of the monthly emissions. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month(s)	Maximum Allowable Cumulative VOC Emissions (Tons)
1	1.4
1-2	2.9
1-3	4.3
1-4	5.7
1-5	5.7

1-6	5.7
1-7	5.7
1-8	5.7
1-9	5.7
1-10	5.7
1-11	5.7
1-12	5.7

After the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for VOC shall be based upon a rolling, 12-month summation of the VOC emissions.

d. According to 40 CFR Part 63, Subpart JJ, a wood furniture manufacturer that emits less than 5 TPY of individual HAP and 12.5 TPY of combined HAP, per rolling 12-month period, is considered an area source (40 CFR 63.800(b)(3)). The initial compliance date for the Wood Furniture Manufacturing NESHAP (40 CFR Part 63, Subpart JJ) was December 7, 1998. According to 40 CFR 63.800(b) sources obtaining and complying with limits to keep the potential to emit HAPs below major source levels after the first compliance date and prior to exceeding area source limits, are precluded from major source permitting requirements.

e. This emissions unit is permitted at its potential to emit, as defined in OAC rule 3745-31-01, for all pollutants.

c) Operational Restrictions

(1) The VOC input for this emissions unit shall not exceed 5.7 tons per year, excluding cleanup, based upon a rolling, 12-month summation of the monthly input values. To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the VOC input levels specified in the following table:

Month(s)	Maximum Allowable Cumulative VOC Input (Tons)
1	1.4
1-2	2.9
1-3	4.3
1-4	5.7

1-5	5.7
1-6	5.7
1-7	5.7
1-8	5.7
1-9	5.7
1-10	5.7
1-11	5.7
1-12	5.7

After the first 12 calendar months following the issuance of this permit, compliance with the annual VOC input limitations shall be based upon a rolling, 12-month summation of the VOC inputs.

(2) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

(3) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information on a monthly basis for the coating materials employed in this emissions unit:

a. the number of gallons of each coating applied or all coatings applied during the month;

b. the VOC content for each or the maximum VOC content of all the coatings applied, in pounds per gallon;

c. the total VOC emissions from all coatings applied, i.e., the summation of the products of d)(1)a times d)(1)b for each individual coating applied; or the product of the maximum VOC content of all the coatings applied times the total gallons of coating employed during the month, i.e., d)(1)a times d)(1)b for worst case coating;

d. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of VOC emissions;

e. the total VOC input from all coatings applied, i.e., the summation of the products of d)(1)a times d)(1)b for each individual coating inputted; or the product of the

maximum VOC content of all the coatings input times the total gallons of coating inputted during the month, i.e., d)(1)a times d)(1)b for worst case coating; and

f. beginning after the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of VOC inputs.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC emissions for each calendar month.

In addition, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative VOC input for each calendar month.

(2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

(4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

(5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

a. the date of the inspection;

b. a description of each/any problem identified and the date it was corrected;

c. a description of any maintenance and repairs performed; and

d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

(6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

(7) The permittee shall collect and record the following information for each day for the coating operation:

a. the company identification for each coating and photochemically reactive cleanup material employed;

b. the number of gallons of each coating and photochemically reactive cleanup material employed;

c. the OC content of each coating and photochemically reactive cleanup material, in pounds per gallon;

d. the total OC emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

e. the total number of hours the emissions unit was in operation; and

f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., d)(7)d / d)(7)e, in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

(8) The federally enforceable permit-to-install and operate (FEPTIO) application for these emissions units, K001, K002, K003, K004, K005, K006, K007 and K009, was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to these emissions units for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminants emitted using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions units, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the ACGIH's "Threshold Limit Values for Chemical Substances and Physical Agents

Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant: Toluene (worst-case; xylene and methanol also emitted above 1 tpy)

TLV (mg/m^3): 188

Maximum Hourly Emission Rate (lbs/hr): 3.95

Predicted 1-Hour Maximum Ground Level Concentration ($\mu g/m^3$): 1,987

MAGLC (ug/m3): 4,476

The permittee, having demonstrated that emissions of toluene, from emissions units K001, K002, K003, K004, K005, K006, K007 and K009, is calculated to be less than eighty per cent of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

(9) Prior to making any physical changes to or changes in the method of operation of the emissions units, that could impact the parameters or values that were used in the predicted 1-hour maximum ground level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower TLV than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(10) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the MAGLC for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(11) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month emission limitation for VOC emissions for this emissions unit and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative emission levels;

ii. all exceedances of the rolling, 12-month limitation for VOC input for this emissions unit and, for the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative input levels;

iii. all exceedances of 8 lbs/hr emission limitation for OC for this emissions unit; and

iv. all exceedances of 40 lbs/day emission limitation for OC for this emissions unit.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual Permit Evaluation Report (PER). If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

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

a. Emissions Limitation:

VOC emissions from this emissions unit shall not exceed 5.7 tons per rolling 12-month period, excluding cleanup.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in d)(1).

b. Emissions Limitation:

OC emissions from this emissions unit shall not exceed 8 lbs/hr.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in d)(7).

c. Emissions Limitation:

OC emissions from this emissions unit shall not exceed 40 lbs/day.

Applicable Compliance Method:

Compliance shall be based on the record keeping specified in d)(7).

g) Miscellaneous Requirements

(1) None.