

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install 02-13739
Mullet Cabinets Inc

A. Source Description

Mullet Cabinet is a mid-sized, wood cabinet manufacturing facility in Holmes County with 4 coating booths, R001, R002, R003 and R004, and 3 dust collection units, P001 through P003. Emissions unit R001 was installed in 1981 without a PTI. Emissions units R002 and R003 were installed in 1991, under PTI 02-5548 issued April 13, 1993. Emissions unit R004 was installed in November 1999, without a PTI. The spray booths are followed by a drying oven set less than 200° F. R001 and R004 periodically use photochemically reactive paint, but normally use non-photochemically reactive coatings and always use non-photochemically reactive cleanup material. R002 and R003 always use non-photochemically reactive coatings and cleanup material. The installation of R004 triggered this permit-to-install.

B. Facility Emissions and Attainment Status

Title V

Mullet's potential to emit from the four coating booths is above the Title V thresholds for VOC and HAPs. The PTE for VOC emissions from the four coating booths is 227 tpy. The PTE for xylene is 15.41 tpy. Mullet has coating usage records documenting that it is presently an inherent minor facility (i.e. actual emissions less than 20% of applicable thresholds) for VOC and HAPs.

MACT Subpart JJ Wood Furniture Manufacturing

Because the facility's PTE for HAPs is greater than 10 tpy for a single HAP and 25 tpy of combined HAPs, the wood furniture MACT (40 CFR 63, subpart JJ) is an applicable regulation. According to 63.800(b), "A source that complies with the limits and criteria specified in paragraphs (b)(1), (b)(2) or (b)(3) of this section is an area source for the purposes of this subpart and is not subject to any other provision of this rule, provided that:(3) The source emits no more than 5 tons of any one HAP per rolling 12-month period and no more than 12.5 tons of any combination of HAP per rolling 12-month period, and at least 90 percent of the plantwide emissions per rolling 12-month period are associated with the manufacturing of wood furniture or wood furniture components." Mullet has coating usage records from 1996 (the first compliance deadline) until the present to document that the actual emissions were less than 5 tpy of each HAP and 12.5 tpy of combined HAPs.

Holmes County in attainment status for all criteria pollutants.

C. Source Emissions

Mullet Cabinet requested federally enforceable limits for OC and HAPs for the purpose of becoming a non-major source for Title V and an area source for the MACT rule, subpart JJ. The terms and condition for R001, R002, R003 and R004 limit the facility-wide HAP emissions to less than 5.0 tons for a single HAP and 12.0 tons total combined HAPs per rolling, 12-month period. Furthermore, the terms and conditions limit OC emissions by limiting the OC content of the coatings and the gallons of coatings employed. OC emissions limits are: R001 to 9.27 tons, R002 to 10.68, R003 to 9.27 tons and R004 to 12.16 tons per rolling, 12-month period (sum of 41.38 tons).

D. Conclusion

The terms and conditions of this permit include monthly coating usage record keeping for the purpose of ensuring compliance with the HAP emissions limits and the OC emissions limit during any rolling 12-month period. Records are kept on a per line basis and then summed monthly. Also this permit requires deviation reports for any day that the coating booths exceed the OC lbs/hr, the OC content per gallon, the rolling, 12-month emission limitation for a single HAP, the rolling, 12-month emission limitation for combined HAPs and the rolling, 12-month emission limit for OC.

The emission limitations for OC and HAPs are sufficient to provide federally enforceable limitations for ensuring that the facility is not subject to the Title V or the MACT subpart JJ regulations.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
HOLMES COUNTY
Application No: 02-13739**

CERTIFIED MAIL

DATE: 8/10/2000

Mullet Cabinets Inc
Duane Miller
7488 SR 241
Salt Creek, OH 44654

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1000** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NEDO

William Racine Environmental Support Network



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 02-13739

Application Number: 02-13739
APS Premise Number: 0238000104
Permit Fee: **To be entered upon final issuance**
Name of Facility: Mullet Cabinets Inc
Person to Contact: Duane Miller
Address: 7488 SR 241
Salt Creek, OH 44654

Location of proposed air contaminant source(s) [emissions unit(s)]:
**7488 SR 241
Salt Creek, Ohio**

Description of proposed emissions unit(s):
Paint spray booth #4 at the Fryburg Door facility.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

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information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional

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facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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Facility ID: 0238000104

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	41.38

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R001 - Coating spray booth #1 for the application of coatings to wood cabinets and trim, followed by a drying oven.	OAC rule 3745-31-05(A)(3)	See A.2.b and A.2.c below. The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)(2)	See A.2.a. below.
	OAC rule 3745-35-07(B)	See A.2.c. through A.2.e. below.
	40 CFR 63, Subpart JJ	See A.2.f. below.

2. Additional Terms and Conditions

- 2.a Each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and from photochemically reactive materials shall not exceed 8 pounds per hour and 40 pound per day. OC emissions from clean up material that is not a photochemically reactive material shall not be included in showing compliance with this limit.
- 2.b Each day that photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are not employed, the OC emissions from coatings and clean up materials shall not exceed 11.56 pounds per hour.
- 2.c The OC emissions from all coatings and cleanup materials shall not exceed 9.27 tons per rolling, 12-month period.

Emissions Unit ID: **R001**

- 2.d** The OC content of each coating shall not exceed 5.78 lbs per gallon, as applied.
- 2.e** Total emissions from R001, R002, R003 and R004 shall not exceed the following limits:
 - i. 5.0 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation.
 - ii. 12.0 tons per year of total combined hazardous air pollutants, (HAPs), based upon a rolling, 12-month period.
- 2.f** The terms and conditions of this permit provide sufficient federally enforceable emissions limits and recordkeeping to limit the facility's potential-to-emit below 10 tons of each individual HAP and 25 tons of total, combined HAPs per rolling, 12-month period; thus, this facility is an area source for this MACT. If the rolling 12-month emissions of Hazardous Air Pollutants (HAP) exceeds 10 tons per year of an individual HAP or 25 tons per year of total, combined HAPs, this facility becomes a major source and must comply with the requirements for a major source per 40 CFR Part 63, Subpart JJ within 365 days after the exceedance. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office.

B. Operational Restrictions

- 1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
- 2. The annual coating usage shall not exceed 3,000 gallons per rolling, 12-month period.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
- 2. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup material are employed in this emissions unit:
 - 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;

Emissions Unit ID: **R001**

- c. the OC content of each coating and photochemically reactive cleanup material, in pounds OC per gallon;
- d. the total emissions rate for all coatings and photochemically reactive cleanup materials, in pounds OC per day;
- e. the total number of hours the emissions unit was in operation;
- f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);
- g. the company identification for each non-photochemically reactive cleanup material employed;
- h. the number of gallons of each non-photochemically reactive cleanup material employed;
- i. the OC content of each non-photochemically reactive cleanup material, in pounds OC per gallon; and
- j. the total emissions rate for all non-photochemically reactive cleanup material, in pounds OC per day.

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

3. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup materials are not employed in this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound (OC) content of each coating and cleanup material, in lbs/gallon;
 - d. the total OC emission rate for all coatings and cleanup materials, in lbs/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 cleanup materials, i.e., (d)/(e), in lbs/hr.

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Emissions Unit ID: **R001**

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4. The permittee shall collect and record the following information for emissions unit R001 each month:
 - a. the name and identification number of each coating, as applied;
 - b. the OC content of each coating, as applied;
 - c. the single Hazardous Air Pollutant (HAP)¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - d. the total combined Hazardous Air Pollutant (HAP) content of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from c);
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup material employed;
 - g. the OC content of each cleanup material, as applied;
 - h. the single HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
 - i. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from h);
 - j. the number of gallons of each cleanup material employed;
 - k. the total single HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (for each HAP, the sum of c. times e. for each coating and the sum of h. times j. for each cleanup material for the previous 12 months);
 - l. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of d. times e. for each coating plus the sum of i. times j. for each cleanup material); and
 - m. the total OC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of b. times e. for each coating plus the sum of g. times j. for each

cleanup material).

¹A 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 field 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.

5. The permittee shall record each month the rolling, 12-month summation of the emissions of each single HAP from emissions units R001, R002, R003 and R004 combined for the previous 12-month period.
6. The permittee shall record each month the rolling, 12-month summation of total, combined HAPs from emissions units R001, R002, R003 and R004 combined for the previous 12-month period.
7. The permittee shall record each month the rolling, 12-month summation of the OC emissions from R001 for the previous 12-month period, (based on the records kept according to Section C.4.m).
8. The permittee shall record each month the rolling, 12-month summation of the total coating usage for emissions unit R001 for the previous 12-month period (based on the records kept according to Section C.4.e).

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Emissions Unit ID: **R001**

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D. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
2. In accordance with Section 2.b. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of each day during which the average OC emissions from the coatings and cleanup materials exceeded 11.56 pounds per hour, and the actual average OC emissions for each such day;
 - d. an identification of each month during which the OC content of any coating exceeded 5.78 pounds per gallon and the actual OC content of each such coatings employed;
 - e. all exceedances of the rolling 12-month emissions limitation for emissions units R001, R002, R003 and R004 for each single HAP;
 - f. all exceedances of the rolling, 12-month emissions limitation for emissions units R001, R002, R003 and R004 for total combined HAPs;
 - g. all exceedances of the rolling, 12-month emissions limitation for OC for this emissions unit; and
 - h. all exceedances of the rolling, 12-month coating usage limit for this emissions unit.
3. The permittee shall also submit annual reports which summarize the following information:

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- a. the emissions of OC from this emission unit;
- b. the emissions of each single HAP from this emissions unit and from emissions units R001, R002, R003 and R004 combined;
- c. the emission of total combined HAPs from this emissions unit and from emissions units R001, R002, R003 and R004 combined; and
- d. the total coating usage of this emissions unit.

The reports shall include the emissions calculations, shall be submitted by February 1 of each year, and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
8 pounds per hour of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.f. based upon the record keeping specified in Section C.2.
 - b. Emissions Limitation:
40 pounds per day of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.d. based upon the record keeping specified in Section C.2.
 - c. Emissions Limitation:
11.56 lbs OC emissions per hour for each day that photochemically reactive materials are not employed.

Applicable Compliance Method:

Emissions Unit ID: **R001**

Compliance shall be determined by the daily values calculated in C.3.f. based on the record keeping specified in Section C.3.

- d. Emissions Limitation:
9.27 tons of OC emissions per rolling, 12-month period from all coatings and cleanup materials.

Applicable Compliance Method:

Compliance shall be determined by the value recorded in C.7. based on the record keeping as specified in Sections C.4.

- e. Emissions Limitations:
5.0 tons of each single HAP, based upon a rolling, 12-month summation for R001, R002, R003 and R004.

Applicable Compliance Method:

Compliance shall be based on the record keeping as specified in Sections C.4.k. and C.5.

- f. Emissions Limitations:
12.0 tons per year of total combined HAPs, based upon a rolling, 12-month summation for R001, R002, R003 and R004.

Applicable Compliance Method:

Compliance shall be based on the record keeping as specified in Sections C.4.l. and C.6.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R002 - Coating spray booth #2 for the application of stains to wood cabinets and trim.	OAC rule 3745-31-05(A)(3)	See A.2.a, A.2.b. and A.2.c below.
	OAC rule 3745-21-07(G)(2)	See Section A.2.a. below.
	OAC rule 3745-35-07(B)	See A.2.c. through A.2.e. below.
	40 CFR 63, Subpart JJ	See A.2.f. below.

2. Additional Terms and Conditions

- 2.a** The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA, Northeast District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

- 2.b** The organic compound (OC) emissions from coatings and clean up materials shall not exceed 16.80 pounds per hour.
- 2.c** The OC emissions from all coatings and cleanup materials shall not exceed 10.68 tons per

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rolling, 12-month period.

- 2.d** The OC content of each coating shall not exceed 6.72 pounds per gallon, as applied.
- 2.e** Total emissions from R001, R002, R003 and R004 shall not exceed the following limits:
 - i. 5.0 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation.
 - ii. 12.0 tons per year of total combined hazardous air pollutants, (HAPs), based upon a rolling, 12-month period.
- 2.f** The terms and conditions of this permit provide sufficient federally enforceable emissions limits and recordkeeping to limit the facility's potential-to-emit below 10 tons of each individual HAP and 25 tons of total, combined HAPs per rolling, 12-month period; thus, this facility is an area source for this MACT. If the rolling 12-month emission of HAPs exceeds 10 tons per year of an individual HAP or 25 tons per year of total, combined HAP, this facility becomes a major source and must comply with the requirements for a major source per 40 CFR Part 63, Subpart JJ, within 365 days after the exceedance. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office.

B. Operational Restrictions

- 1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
- 2. The annual coating usage shall not exceed 3,000 gallons per rolling, 12-month period.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
- 2. The permittee shall collect and record the following information for each day:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;

Emissions Unit ID: **R002**

- c. the organic compound (OC) content of each coating and cleanup material, in lbs/gallon;
 - d. the total OC emission rate for all coatings and cleanup materials, in lbs/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 cleanup materials, i.e., (d)/(e), in lbs/hr.
3. The permittee shall collect and record the following information for emissions unit R002 each month:
- a. the name and identification number of each coating, as applied;
 - b. the OC content of each coating, as applied;
 - c. the single Hazardous Air Pollutant (HAP)¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - d. the total combined Hazardous Air Pollutant (HAP) content of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from c);
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup material employed;
 - g. the OC content of each cleanup material, as applied;
 - h. the single HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
 - i. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from h);
 - j. the number of gallons of each cleanup material employed;
 - k. the total single HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (for each HAP the sum of c. times e. for each coating and the sum of h. times j. for each cleanup material for the previous 12 months);

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- l. the total combined HAPs emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of d. times e. for each coating plus the sum of i. times j. for each cleanup material); and
- m. the total OC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of b times e. for each coating plus the sum of g. times j. for each cleanup material).

¹A 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 field 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.

4. The permittee shall record each month the rolling, 12-month summation of the emissions of each single HAP from emissions units R001, R002, R003 and R004 for the previous 12-month period.
5. The permittee shall record each month the rolling, 12-month summation of total, combined HAPs from emissions units R001, R002, R003 and R004 for the previous 12-month period.
6. The permittee shall record each month the rolling, 12-month summation of OC emission from R002 for the previous 12-month period, (based on the records kept according to Section C.3.m.).
7. The permittee shall record each month the rolling, 12-month summation of the total coating usage from emissions unit R002 for the previous 12-month period (based on the records kept according to Section C.3).
8. The permit to install for this emissions unit R002 was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 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	n-Butyl acetate	Ethanol	Ethyl acetate	Isobutyl acetate	Isobutyl alcohol
TLV (mg/m3)	713	1880	1440	532	152
Maximum Hourly Emission Rate (lbs/hr)	0	0	0.881	0	0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)	0	0	95.7	0	0
Sum R002, R003 and R004 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)	706	967	182	455	442
MAGLC (ug/m3)	16,976	44,762	34,286	12,667	3,619

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Pollutant	Isopropyl acetate	Propyl alcohol	Propylene glycol monomethyl ether	Toluene	Xylene
TLV (mg/m3)	532	492	369	188	434
Maximum Hourly Emission Rate (lbs/hr)	0	0	0	0	0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)	0	0	0	0	0
Sum R002, R003 and R004 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)	383	236	97	185	420
MAGLC (ug/m3)	16,976	11,714	8,786	4,476	10,333

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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- 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.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- 10. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

- 1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
- 2. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that photochemically reactive material was employed in this emissions unit. The written notification shall include the gallons of photochemically reactive material employed and a description of the corrective measures taken to prevent a reoccurrence. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.

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- a. Emissions Limitation:
16.80 pounds OC emissions per hour from all coating and cleanup materials.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.f. based on the record keeping specified in Section C.2.
 - b. Emissions Limitation:
10.68 tons of OC emissions per rolling, 12-month period from all coatings and cleanup material

Applicable Compliance Method:
Compliance shall be determined by the value recorded in C.6. based upon the record keeping specified in Section C.3.
 - c. Emissions Limitations:
5.0 tons of each single HAP, based upon a rolling, 12-month summation for R001, R002, R003 and R004.

Applicable Compliance Method:
Compliance shall be based on the record keeping as specified in Sections C.3.k. and C.4.
 - d. Emissions Limitations:
12.0 tons per year of total combined HAPs, based upon a rolling, 12-month summation for R001, R002, R003 and R004.

Applicable Compliance Method:
Compliance shall be based on the record keeping as specified in Sections C.3.l. and C.5.
2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

1. The terms and conditions of this permit replace in whole the requirements of PTI 02-5548, issued April 13, 1993.
2. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F.

Mullet Cabinets Inc
PTI Application 02-12720
Issue

Facility ID: 0238000104

Emissions Unit ID: R002

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R003 - Coating spray booth #3 for the application of coatings to wood cabinets and trim, followed by a drying oven.	OAC rule 3745-31-05(A)(3)	See A.2.a, A.2.b and A.2.c below.
	OAC rule 3745-21-07(G)(2)	See A.2.a. below
	OAC rule 3745-35-07(B)	See A.2.c. through A.2.e. below.
	40 CRF 63, Subpart JJ	See A.2.f. below.

2. Additional Terms and Conditions

- 2.a** The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

Prior to employing any photochemically reactive materials, the permittee shall provide written notification to, and obtain approval from, the Ohio EPA, Northeast District Office. Such notification shall include information sufficient to determine that the emissions associated with the proposed change in materials will comply with the emission limits and/or control requirements as defined in OAC 3745-21-07(G)(2). This notification, at a minimum, shall include the company identification of the new material to be employed, the solvent composition of the material, and the maximum amount to be used, in pounds per hour.

- 2.b** The organic compound (OC) emissions from coatings and clean up materials shall not exceed 14.46 pounds per hour.

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- 2.c The (OC) emissions from all coatings and cleanup materials shall not exceed 9.27 tons per rolling, 12-month period.
- 2.d The OC content of each coating shall not exceed 5.78 pounds per gallon, as applied.
- 2.e Total emissions from R001, R002, R003 and R004 shall not exceed the following limits:
 - i. 5.0 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation.
 - ii. 12.0 tons per year of total combined hazardous air pollutants, (HAPs), based upon a rolling, 12-month period.
- 2.f The terms and conditions of this permit provide sufficient federally enforceable emissions limits and recordkeeping to limit the facility's potential-to-emit below 10 tons of each individual HAP and 25 tons of total, combined HAPs per rolling, 12-month period; thus, this facility is an area source for this MACT. If the rolling 12-month emission of HAPs exceeds 10 tons per year of an individual HAP or 25 tons per year of total, combined HAPs, this facility becomes a major source and must comply with the requirements for a major source per 40 CFR Part 63, Subpart JJ, within 365 days after the exceedance. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office.

B. Operational Restrictions

- 1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
- 2. The annual coating usage shall not exceed 3,000 gallons per rolling, 12-month period.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
- 2. The permittee shall collect and record the following information for each day:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;

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- c. the organic compound (OC) content of each coating and cleanup material, in lbs/gallon;
 - d. the total OC emission rate for all coatings and cleanup materials, in lbs/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 cleanup materials, i.e., (d)/(e), in lbs/hr.
3. The permittee shall collect and record the following information for emissions units R003 each month:
- a. the name and identification number of each coating, as applied;
 - b. the OC content of each coating, as applied;
 - c. the single Hazardous Air Pollutant (HAP)¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - d. the total combined Hazardous Air Pollutant (HAP) content of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from c);
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup material employed;
 - g. the OC content of each cleanup material, as applied;
 - h. the single HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
 - i. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from h);
 - j. the number of gallons of each cleanup material employed;
 - k. the total single HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (for each HAP the sum of c. times e. for each coating and the sum of h. times j. for each cleanup material for the previous 12 months);

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- l. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of d. times e. for each coating plus the sum of i. times j. for each cleanup material); and
- m. the total OC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of b times e. for each coating plus the sum of g. times j. for each cleanup material).

¹A 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 field 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.

4. The permittee shall record each month the rolling, 12-month summation of the emissions of each single HAP from emissions units R001, R002, R003 and R004 combined for the previous 12 month period.
5. The permittee shall record each month the rolling, 12-month summation of the emissions of total, combined HAPs from emissions units R001, R002, R003 and R004 combined for the previous 12 month period.
6. The permittee shall record each month the rolling, 12-month summation of OC emissions from R002 for the previous 12-month period (based on the records kept according to Section C.3.m.).
7. The permittee shall record each month the rolling, 12-month summation of the total coating usage for emissions unit R003 for the previous 12-month period (based on the records kept according to Section C.3).
8. The permit to install for this emissions unit R003 was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 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	n-Butyl acetate	Ethanol	Ethyl acetate	Isobutyl acetate	Isobutyl alcohol
TLV (mg/m3)	713	1880	1440	532	152
Maximum Hourly Emission Rate (lbs/hr)	0	0	0.881	0	0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)	0	0	95.7	0	0
Sum R002, R003 and R004 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)	706	967	182	455	442
MAGLC (ug/m3)	16,976	44,762	34,286	12,667	3,619

Pollutant	Isopropyl acetate	Propyl alcohol	Propylene glycol monomethyl ether	Toluene	Xylene
TLV (mg/m3)	532	492	369	188	434
Maximum Hourly Emission Rate (lbs/hr)	0	0	0	0	0
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)	0	0	0	0	0

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Sum R002, R003 and R004 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)	383	236	97	185	420
MAGLC (ug/m3)	16,976	11,714	8,786	4,476	10,333

9. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value 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 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.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

10. The permittee shall collect, record, and retain the following information when it conducts

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evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
2. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that photochemically reactive material was employed in this emissions unit. The written notification shall include the gallons of photochemically reactive material employed and a description of the corrective measures taken to prevent a reoccurrence. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
3. In accordance with Section 2.b. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. an identification of each day during which the average OC emissions from the coatings and cleanup materials exceeded 14.46 lbs/hr, and the actual average OC emissions for each such day;
 - b. an identification of each month during which the OC content of any coating exceeded 5.78 pounds per gallon and the actual OC content of each such coatings employed;
 - c. all exceedances of the rolling, 12-month emissions limitation for each single HAP from emissions units R001, R002, R003 and R004;
 - d. all exceedances of the rolling, 12-month emissions limitation for total combined HAPs

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- c. Emissions Limitations:
5.0 tons of each single HAP, based upon a rolling, 12-month summation for R001, R002, R003 and R004.

Applicable Compliance Method:

Compliance shall be based on the record keeping as specified in Sections C.3.k. and C.4.

- d. Emissions Limitations:
12.0 tons per year of total combined HAPs, based upon a rolling, 12-month summation for R001, R002, R003 and R004.

Applicable Compliance Method:

Compliance shall be based on the record keeping as specified in Sections C.3.l. and C.5.

- 2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

- 1. The terms and conditions of this permit replace in whole the requirements of PTI 02-5548, issued April 13, 1993.
- 2. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
R004 - Coating spray booth #4 for the application of coatings to wood cabinets and trim, followed by a drying oven.	OAC rule 3745-31-05(A)(3)	See A.2.b and A.2.c below. The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2).
	OAC rule 3745-21-07(G)	See A.2.a. below.
	OAC rule 3745-35-07(B)	See A.2.c.through A.2.e. below.
	40 CFR 63, Subpart JJ	See A.2.f. below.

2. Additional Terms and Conditions

- 2.a Each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and from photochemically reactive materials shall not exceed 8 pounds per hour and 40 pound per day. OC emissions from clean up material that is not a photochemically reactive material shall not be included in showing compliance with this limit.
- 2.b Each day that photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)]are not employed, the OC emissions from coatings and clean up materials shall not exceed 14.46 pounds per hour.
- 2.c The OC emissions from all coatings and cleanup materials shall not exceed 12.16 tons per rolling, 12-month period.

- 2.d** The OC content of each coating shall not exceed 5.78 pounds per gallon, as applied.
- 2.e** Total emissions from R001, R002, R003 and R004 shall not exceed the following limits:
- i. 5.0 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation.
 - ii. 12.0 tons per year of total combined hazardous air pollutants, (HAPs), based upon a rolling, 12-month period.
- 2.f** The terms and conditions of this permit provide sufficient federally enforceable emissions limits and recordkeeping to limit the facility's potential-to-emit below 10 tons of each individual HAP and 25 tons of total, combined HAPs per rolling 12-month period; thus, this facility is an area source for this MACT. If the rolling 12-month emission of HAPs exceeds 10 tons per year of an individual HAP or 25 tons per year of total, combined HAPs, this facility becomes a major source and must comply with the requirements for a major source per 40 CFR Part 63, Subpart JJ, within 365 days after the exceedance. A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office.

B. Operational Restrictions

1. The permittee shall operate the dry filters whenever this emissions unit is in operation.
2. The annual coating usage shall not exceed 4,000 gallons per rolling, 12-month period.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup materials are employed in this emissions unit:
 - 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;

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- c. the OC content of each coating and photochemically reactive cleanup material, in pounds OC per gallon;
- d. the total emissions rate for all coatings and photochemically reactive cleanup materials, in pounds OC per day;
- e. the total number of hours the emissions unit was in operation;
- f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);
- g. the company identification for each non-photochemically reactive cleanup material employed;
- h. the number of gallons of each non-photochemically reactive cleanup material employed;
- i. the OC content of each non-photochemically reactive cleanup material, in pounds OC per gallon; and
- j. the total emissions rate for all non-photochemically reactive cleanup material, in pounds OC per day.

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

3. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup materials are not employed in this emissions unit:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed;
 - c. the organic compound (OC) content of each coating and cleanup material, in lbs/gallon;
 - d. the total OC emission rate for all coatings and cleanup materials, in lbs/day;
 - e. the total number of hours the emissions unit was in operation; and

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- f. the average hourly OC emission rate for all coatings and cleanup, i.e., (d)/(e), in lbs/hr.
4. The permittee shall collect and record the following information for emissions unit R004 each month:
 - a. the name and identification number of each coating, as applied;
 - b. the OC content of each coating, as applied;
 - c. the single Hazardous Air Pollutant (HAP)¹ content for each HAP of each coating in pounds of individual HAP per gallon of coating, as applied;
 - d. the total combined Hazardous Air Pollutant (HAP) content of each coating in pounds of combined HAPs per gallon of coating, as applied (sum all the individual HAP contents from c);
 - e. the number of gallons of each coating employed;
 - f. the name and identification of each cleanup material employed;
 - g. the OC content of each cleanup material, as applied;
 - h. the single HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
 - i. the total combined HAP content of each cleanup material in pounds of combined HAPs per gallon of cleanup material, as applied (sum all the individual HAP contents from h);
 - j. the number of gallons of each cleanup material employed;
 - k. the total single HAP emissions for each HAP from all coatings and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (for each HAP the sum of c. times e. for each coating and the sum of h. times j. for each cleanup material for the previous 12 months);
 - l. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of d. times e. for each coating plus the sum of i. times j. for each cleanup material); and
 - m. the total OC emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of b times e. for each coating plus the sum of g. times j. for each

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Emissions Unit ID: **R004**

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cleanup material).

¹A 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 field 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.

5. The permittee shall record each month the rolling, 12-month summation of the emissions of each single HAP from emissions units R001, R002, R003 and R004 combined for the previous 12-month period.
6. The permittee shall record each month the rolling, 12-month summation of the emission of the emissions of total, combined HAPs from emissions units R001, R002, R003 and R004 combined for the previous 12-month period.
7. The permittee shall record each month the rolling, 12-month summation of OC emissions from R004 and from R001, R002, R003 and R004 combined for the previous 12 month period (based on the records kept according to Section C.4.m.).
8. The permittee shall record each month the rolling, 12-month summation of the total coating usage for emissions unit R004 for the previous 12-month period (based on the records kept according to Section C.3).
9. The permit to install for this emissions unit R004 was evaluated based on the actual materials (typically coatings and cleanup 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 for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 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	n-Butyl acetate	Ethanol	Ethyl acetate	Isobutyl acetate	Isobutyl alcohol
TLV (mg/m ³)	713	1880	1440	532	152
Maximum Hourly Emission Rate (lbs/hr)	7.20	8.42	0.881	2.20	2.14

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)	706	826	86.5	216	210
Sum R002, R003 and R004 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)	706	967	182	455	442
MAGLC (ug/m3)	16,976	44,762	34,286	12,667	3,619

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Pollutant	Isopropyl acetate	Propyl alcohol	Propylene glycol monomethyl ether	Toluene	Xylene
TLV (mg/m3)	532	492	369	188	434
Maximum Hourly Emission Rate (lbs/hr)	1.86	1.14	0.987	1.22	3.34
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)	182	112	96.8	120	327
Sum R002, R003 and R004 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3)	383	236	97	185	420
MAGLC (ug/m3)	16,976	11,714	8,786	4,476	10,333

10. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. 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 (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists

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(ACGIH)," than the lowest TLV value 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 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.).

If the permittee determines that the "Air Toxic Policy" 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(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

- 11. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":
 - a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
 - b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
 - c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

- 1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Northeast District Office) within 30 days after the event occurs.
- 2. In accordance with Section 2.b. of the General Terms and Conditions, the permittee shall submit quarterly deviation (excursion) reports which include the following information:

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- a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly OC emissions for each such day;
 - b. for the days during which a photochemically reactive material was employed, an identification of each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual OC emissions for each such day;
 - c. an identification of each day during which the average OC emissions from the coatings and cleanup materials exceeded 14.46 lbs/hr, and the actual average OC emissions for each such day;
 - d. an identification of each month during which the OC content of any coating exceeded 5.78 pounds per gallon and the actual OC content of each such coatings employed;
 - e. all exceedances of the rolling 12-month emissions limitation for emissions units R001, R002, R003 and R004 for each single HAP;
 - f. all exceedances of the rolling, 12-month emissions limitation for emissions unit R001, R002, R003 and R004 for total combined HAPs;
 - g. all exceedances of the rolling, 12-month emissions limitation for OC from this emission unit; and
 - h. all exceedances of the rolling, 12-month coating usage limitation for this emissions unit.
3. The permittee shall also submit annual reports which summarize the following information:
- a. the emissions of OC from this emission unit;
 - b. the emissions of each single HAP from this emissions unit and from emissions units R001, R002, R003 and R004 combined;
 - c. the emission of total combined HAPs from this emissions unit and from emissions units R001, R002, R003 and R004 combined; and
 - d. the total coating usage of this emissions unit.

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PTI

Emissions Unit ID: **R004**

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- e. Emissions Limitations:
5.0 tons of each single HAP, based upon a rolling, 12-month summation for R001, R002, R003 and R004.

Applicable Compliance Method:

Compliance shall be based on the record keeping as specified in Sections C.4.k. and C.5.

- f. Emissions Limitations:
12.0 tons per year of total combined HAPs, based upon a rolling, 12-month summation for R001, R002, R003 and R004.

Applicable Compliance Method:

Compliance shall be based on the record keeping as specified in Sections C.4.l. and C.6.

- 2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the coatings and cleanup materials employed in the emissions unit.

F. Miscellaneous Requirements

- 1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to install are federally enforceable: A-F.

NEW SOURCE REVIEW FORM B

PTI Number: 02-13739 Facility ID: 0238000104

FACILITY NAME Mullet Cabinets Inc

FACILITY DESCRIPTION Manufacturer of wood cabinets CITY/TWP Salt Creek

Emissions Unit ID: R004

SIC CODE 2434 SCC CODE 4-02-019-01 EMISSIONS UNIT ID R001

EMISSIONS UNIT DESCRIPTION Spray booth #1 for the application of coatings to wood cabinets.

DATE INSTALLED 9/81

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	9.64 lbs/hr	3.05	11.56 lbs/hr	9.27
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? JJ wood furniture PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC rule 3745-21-07(G)(2) and emissions rate established by the terms and conditions of this permit;

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no
OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$X

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS:

NEW SOURCE REVIEW FORM B

PTI Number: 02-13739 Facility ID: 0238000104

FACILITY NAME Mullet Cabinets Inc

FACILITY DESCRIPTION Manufacturer of wood cabinets CITY/TWP Salt Creek

Emissions Unit ID: R004

SIC CODE 2434 SCC CODE 4-02-019-01 EMISSIONS UNIT ID R002

EMISSIONS UNIT DESCRIPTION Spray booth #2 for the application of coatings to wood cabinets

DATE INSTALLED 1992

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	15.28 lbs/hr	3.05	16.80 lbs/hr	10.68
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP? JJ wood

PSD?

OFFSET POLICY?

furniture

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of photochemically reactive prohibited; compliance with the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$X

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?

X YES NO

IDENTIFY THE AIR CONTAMINANTS:

n-Butyl acetate, Ethanol, Ethyl acetate, Isobutyl acetate, Isobutyl alcohol, Isopropyl acetate, Propylene glyco monomethyl ether, Propyl alcohol, Toluene, Xylene.

NEW SOURCE REVIEW FORM B

PTI Number: 02-13739 Facility ID: 0238000104

FACILITY NAME Mullet Cabinets Inc

FACILITY DESCRIPTION Manufacturer of wood cabinets CITY/TWP Salt Creek

Emissions Unit ID: R004

SIC CODE 2434 SCC CODE 4-02-019-01 EMISSIONS UNIT ID R003

EMISSIONS UNIT DESCRIPTION Spray booth for the application of coatings to wood cabinets

DATE INSTALLED 1992

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	12.05 lbs/hr	3.05	14.46 lbs/hr	9.27
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP? JJ wood

PSD?

OFFSET POLICY?

furniture

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Use of photochemically reactive material is prohibited; compliance with the terms and conditions of this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$X

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: n-Butyl acetate, Ethanol, Ethyl acetate, Isobutyl acetate, Isobutyl alcohol, Isopropyl acetate, Propylene glyco monomethyl ether, Propyl alcohol, Toluene, Xylene.

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PTI Num

FACILITY

Emissions Unit ID: **R004**

FACILITY DESCRIPTION Manufacturer of wood cabinets

CITY/TWP Salt Creek

SIC CODE 2434

SCC CODE 4-02-019-1

EMISSIONS UNIT ID R004

EMISSIONS UNIT DESCRIPTION Spray booth #4 for the application of coatings to wood cabinets, followed by a drying oven.

DATE INSTALLED 11/99

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	<u>attainment</u>	<u>12.05 lbs/hr</u>	<u>3.05</u>	<u>14.46 lbs/hr</u>	<u>12.16</u>
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP? JJ wood

PSD?

OFFSET POLICY?

furniture

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Compliance with OAC rule 3745-07-(G)(2) and emissions rate established by the terms and conditions of this permit.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*?

X YES NO

IDENTIFY THE AIR CONTAMINANTS:

n-Butyl acetate, Ethanol, Ethyl acetate, Isobutyl acetate, Isobutyl alcohol, Isopropyl acetate, Propylene glyco monomethyl ether, Propyl alcohol, Toluene, Xylene

5 NEW SOURCE REVIEW FORM B

PTI Number: 02-13739

Facility ID: 0238000104

FACILITY NAME Mullet Cabinets Inc

FACILITY DESCRIPTION Manufacturer of wood cabinets

CITY/TWP Salt Creek

Emissions Unit ID: R004

Ohio EPA Permit to Install Information Form please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit hard copy items to Pam McGraner, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input checked="" type="checkbox"/>	<u>0000000c.wpd</u>	<input type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	<u>0000000s.wpd</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	<u>0000000a.wpd</u>	<input type="checkbox"/>	<input type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	<u>0000000b.wpd</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	<u>0000000t.wpd</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

NONE

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination
Permit To Install 02-13739

A. Source Description

Mullet Cabinet is a mid-sized, wood cabinet manufacturing facility in Holmes County with 4 coating booths, R001, R002, R003 and R004, and 3 dust collection units, P001 through P003. Emissions unit R001 was installed in 1981 without a PTI. Emissions units R002 and R003 were installed in 1991, under PTI 02-5548 issued April 13, 1993. Emissions unit R004 was installed in November 1999, without a PTI. The spray booths are followed by a drying oven set less than 200° F. R001 and R004 periodically use photochemically reactive paint, but normally use non-photochemically reactive coatings and always use non-photochemically reactive cleanup material. R002 and R003 always use non-photochemically reactive coatings and cleanup material. The installation of R004 triggered this permit-to-install.

B. Facility Emissions and Attainment Status

NEW SOURCE REVIEW FORM B

PTI Number: 02-13739

Facility ID: 0238000104

FACILITY NAME Mullet Cabinets Inc

FACILITY DESCRIPTION Manufacturer of wood cabinets

CITY/TWP Salt Creek

Emissions Unit ID: R004

Title V

Mullet's potential to emit from the four coating booths is above the Title V thresholds for VOC and HAPs. The PTE for VOC emissions from the four coating booths is 227 tpy. The PTE for xylene is 15.41 tpy. Mullet has coating usage records documenting that it is presently an inherent minor facility (i.e. actual emissions less than 20% of applicable thresholds) for VOC and HAPs.

MACT Subpart JJ Wood Furniture Manufacturing

Because the facility's PTE for HAPs is greater than 10 tpy for a single HAP and 25 tpy of combined HAPs, the wood furniture MACT (40 CFR 63, subpart JJ) is an applicable regulation. According to 63.800(b), "A source that complies with the limits and criteria specified in paragraphs (b)(1), (b)(2) or (b)(3) of this section is an area source for the purposes of this subpart and is not subject to any other provision of this rule, provided that:(3) The source emits no more than 5 tons of any one HAP per rolling 12-month period and no more than 12.5 tons of any combination of HAP per rolling 12-month period, and at least 90 percent of the plantwide emissions per rolling 12-month period are associated with the manufacturing of wood furniture or wood furniture components." Mullet has coating usage records from 1996 (the first compliance deadline) until the present to document that the actual emissions were less than 5 tpy of each HAP and 12.5 tpy of combined HAPs.

Holmes County in attainment status for all criteria pollutants.

C. Source Emissions

Mullet Cabinet requested federally enforceable limits for OC and HAPs for the purpose of becoming a non-major source for Title V and an area source for the MACT rule, subpart JJ. The terms and condition for R001, R002, R003 and R004 limit the facility-wide HAP emissions to less than 5.0 tons for a single HAP and 12.0 tons total combined HAPs per rolling, 12-month period. Furthermore, the terms and conditions limit OC emissions by limiting the OC content of the coatings and the gallons of coatings employed. OC emissions limits are: R001 to 9.27 tons, R002 to 10.68, R003 to 9.27 tons and R004 to 12.16 tons per rolling, 12-month period (sum of 41.38 tons).

D. Conclusion

The terms and conditions of this permit include monthly coating usage record keeping for the purpose of ensuring compliance with the HAP emissions limits and the OC emissions limit during any rolling 12-month period. Records are kept on a per line basis and then summed monthly. Also this permit requires deviation reports for any day that the coating booths exceed the OC lbs/hr, the OC content per gallon, the rolling, 12-month emission limitation for a single HAP, the rolling, 12-month emission limitation for combined HAPs and the rolling, 12-month emission limit for OC.

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PTI Num

FACILITY

Emissions Unit ID: **R004** _____

FACILITY DESCRIPTION Manufacturer of wood cabinets CITY/TWP Salt Creek

The emission limitations for OC and HAPs are sufficient to provide federally enforceable limitations for ensuring that the facility is not subject to the Title V or the MACT subpart JJ regulations.

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

This PTI is a template 75 and 87 permit with Air Toxic language (R001 was installed prior to the Air Toxics Policy), dry filter language and with HAP recordkeeping language. R001 and R004 periodically use photochemically reactive paint, but normally use non-photochemically reactive coatings and always use non-photochemically reactive cleanup material. R002 and R003 never use photochemically reactive coatings.

Please complete:

SUMMARY (for informational purposes only)	
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS	
<u>Pollutant</u>	<u>Tons Per Year</u>
<u>OC</u>	<u>41.38</u>