Synthetic Minor Determination and/or ☐ Netting Determination
Permit To Install: 02-22833

A. Source Description
Mullet Cabinet is a manufacturer of wood cabinets and trim located in Holmes County. This PTI is for the installation of a counter top laminating area.

B. Facility Emissions and Attainment Status
Mullet Cabinet has five existing coating booths permitted to include federally enforceable emission limitations to limit the PTE to 41.38 tons VOC, 5.0 tons individual HAP and 12.0 tons total combined HAPs.

Holmes County is attainment for all criteria pollutants.

C. Source Emissions
Emissions unit R006 is a laminate counter top manufacturing operation including tow, manual, HVLP pump/gun combinations. Parts are air dried and manually moved. All emissions are fugitive from the building. Emissions unit R006 has the PTE of 17.0 tons VOC per year, 4.81 tons individual HAP per year and 8.97 tons total combined HAPs per year.

The facility requested federally enforceable limits of 9.9 tons individual HAP and 24.9 tons total combined HAP per year from emissions units R001, R002, R003, R004, R005 and R006, combined. To achieve this goal, the facility will be required to keep monthly records of the facility-wide, rolling, 12-month emissions of individual HAP and total combined HAPs, and submit quarterly deviation reports.

D. Conclusion
The emission limitations, operational restrictions and record keeping requirements are sufficiently federally enforceable to keep this facility a minor source for individual HAP and total combined HAPs, thus avoiding Title V and the Wood Furniture Manufacturing MACT.

State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
HOLMES COUNTY

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 02-22833
Fac ID: 0238000104

DATE: 1/3/2008

Mullet Cabinets Inc
Lamar Troyer
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, 43216-1049.

A Permit to Install may be issued in proposed of 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 **$400** 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.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **NEDO**

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **02-22833** FOR AN AIR CONTAMINANT SOURCE
FOR **Mullet Cabinets Inc**

On 1/3/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Mullet Cabinets Inc**, located at **7488 SR 241, Salt Creek**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-22833:

2 pressure pots w/HVLP guns.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Dennis Bush, Ohio EPA, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087
[(330)425-9171]

DRAFT PERMIT TO INSTALL 02-22833

Application Number:	02-22833
Facility ID:	0238000104
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Mullet Cabinets Inc
Person to Contact:	Lamar Troyer
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):
2 pressure pots w/HVLP guns.

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

Chris Korleski
Director

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

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 (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

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 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 facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit 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 cannot meet the requirements of this permit 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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 ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

Pollutant	Tons Per Year
OC/VOC	17.0

Issued: To be entered upon final issuance
PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 - (R006) - Laminate counter top manufacturing area including two HVLP pressure pots to apply adhesive.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.b, A.2.c and A.2.d below.
OAC rule 3745-21-07(G)(2)	See section A.2.a below.
OAC rule 3745-31-05(C)	See sections A.2.e and B.1 below.
OAC rule 3745-114-01	See section A.2.f below.

2. Additional Terms and Conditions

2.a Each day that a photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all adhesives and from photochemically reactive cleanup materials shall not exceed 8 pounds per hour and 40 pounds per day. OC emissions from cleanup 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 rule 3745-21-01(C)(5)] are not employed, the volatile organic compound (VOC) emissions from adhesives and cleanup materials shall not exceed 3.87 pounds per hour, as a daily average. This limit is based upon the maximum application rate of 1.0 gallon per hour.

2.c The VOC emissions from all VOC containing-material shall not exceed 17.0 tons per year.

2.d The VOC content of each adhesive shall not exceed 3.87 pounds per gallon, as applied.

2.e Pursuant to OAC rule 3745-31-05(C), total facility-wide emissions shall not

exceed 9.9 tons per year of each individual hazardous air pollutant (HAP), and 24.9 tons per year of total combined HAPs, based upon a rolling, 12-month summation.

2.f In order to demonstrate compliance with the "Toxic Air Contaminant Statute", the director has established, per ORC 3704.03(F)(4)(c), a limit for hexane, which shall not exceed 26.33 pounds per day.

This daily allowable emission rate was calculated by multiplying the approved daily operating schedule submitted in the permit application (24 hrs/day), by the emission rate modeled (1.199 lbs/hr) to determine the ground level concentration passed the property line. The daily hexane emission limitation cannot be exceeded with the current model inputs (adhesive formulation, application rate, and fugitive egress size and location). Therefore, no record keeping and reporting requirements are included to demonstrate compliance. If the parameters change, the facility must follow the requirements in sections C.7, C.8 and D.3.

B. Operational Restrictions

1. The maximum adhesive and clean up material usage in this emissions unit and facility-wide shall not exceed 9.9 tons of a individual HAP or 24.9 tons of total combined HAPs per rolling, 12-months. The permittee has existing adhesive and cleanup material usage records such that there is no need for first year monthly VOC emission limitations.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day during which any photochemically reactive material is employed in this emissions unit:

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

   b. the number of gallons of each adhesive and photochemically reactive cleanup material employed minus the number of gallons of each adhesive and photochemically reactive cleanup material recovered for disposal;

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

d. the total emission rate for all the adhesives 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 the adhesives and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);

g. the VOC content of each adhesive and photochemically reactive cleanup material, in pounds VOC per gallon; and

h. the total emissions rate for all adhesives and photochemically reactive cleanup materials, in pounds VOC per day.

[Note: The adhesive information must be for the adhesives 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).]

2. The permittee shall collect and record the following information for each day during which no photochemically reactive materials are employed in this emissions unit:

a. the company identification for each adhesive and cleanup material employed;

b. documentation on whether or not each material employed (adhesive and cleanup) was a photochemically reactive material, as defined in OAC rule 3745-21-01(C)(5);

c. the VOC content of each adhesive, in lbs/gallon, as applied;

d. the number of gallons of each adhesive employed minus the number of gallons of each adhesive recovered for disposal;

e. the total VOC emissions from all the adhesives employed, in lbs/day, i.e., sum of (c) times (d);

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

g. the average hourly VOC emission rate for all the adhesives, i.e., (e)/(f), in lbs/hr.

3. The permittee shall collect and record the following information for each month for the

emissions unit:

a. the number of gallons of each nonphotochemically reactive cleanup material employed minus the number of gallons of cleanup material recovered for disposal;

b. the VOC content of each nonphotochemically cleanup material, in lbs/gallon; and

c. the total VOC emissions from all nonphotochemically reactive cleanup materials employed, in lbs/month, i.e., sum of (b) times (a).

4. The permittee shall calculate and record the total VOC emissions from all the adhesives and cleanup materials employed, in tons per calendar year; [i.e., (the summation of the daily VOC emissions, from section C.1.h, for the calendar year + the summation of the daily VOC emissions, from section C.2.e, for the calendar year + the monthly non-photochemically reactive cleanup material VOC emission from section C.3.c) divided by 2000 lbs/ton].

5. The permittee shall collect and record the following information each month for emissions unit R006:

a. the name and identification number of each adhesive and cleanup material, as applied;

b. the number of gallons of each adhesive and cleanup material employed;

c. the individual HAP[1] content for each HAP of each adhesive and cleanup material, in pounds of individual HAP per gallon of adhesive, as applied;

d. the total individual HAP emissions for each HAP from all adhesives and cleanup materials employed, in tons per month, i.e., for each HAP the sum of (b) times (c) for each adhesive and cleanup material divided by 2000 lbs/ton;

e. the rolling, 12-month summation of the emissions of each individual HAP from emissions unit R006 for the previous 12-month period, i.e., the summation of (d) in tons per rolling, 12-month period;

f. the total combined HAPs[1] content for all HAPs of each adhesive and cleanup material, in pounds of total combined HAPs per gallon of adhesive, as applied;

g. the total combined HAPs emissions from all adhesives and cleanup materials employed, in tons per month, i.e., the sum of (b) times (f) for each adhesive and cleanup material divided by 2000; and

h. the rolling, 12-month summation of the emissions of total combined HAPs from emissions unit R006 and facility-wide for the previous 12-month period, i.e., the summation of (g) in tons per rolling, 12-month period;

[1] 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 or local air agency contact. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvents contained in the adhesives or cleanup materials. This information does not have to be kept on a line-by-line basis.

6. The permit to install for this emissions unit (R006) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexane
TLV (mg/m3): 176.2
Maximum Hourly Emission Rate (lbs/hr): 1.199
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4,144
MAGLC (ug/m3): 4,145

The permittee, having demonstrated that emissions of hexane, from emissions unit K006, is estimated to be equal or greater than eighty per cent, but less than 100 per cent of the maximum acceptable ground level concentration (MAGLC), shall not operate the emissions unit at a rate that would exceed the daily emissions rate, process weight rate, and/or restricted hours of operations, as allowed in this permit; and any new raw material or processing agent shall not be applied without evaluating each component toxic contaminant in accordance with ORC 3704.03(F).

7. Prior to making any physical changes to or changes in the method of operation of the emissions unit, 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 Threshold Limit Value (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 3745-114-01, that was modeled from the initial (or last) application; and

   c. physical changes to the emissions unit 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 ORC 3704.03(F), the statute, has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The director may consider any significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

8. The permittee shall collect, record and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute":

   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 Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with 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 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 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.

D. Reporting Requirements

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

a. for the days during which any photochemically reactive material was employed, each day during which the OC emissions from the adhesives and photochemically reactive cleanup materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such day;

b. for the days during which no photochemically reactive materials were employed, each day during which the average VOC emissions from the adhesives exceeded 3.87 pounds per hour, and the actual average VOC emissions for each such day;

c. each day during which the VOC content of any adhesive exceeded 3.87 pounds per gallon, and the actual VOC content of each such adhesive employed;

d. any exceedance of the individual HAP facility-wide emission limitation of 9.9 tons per year based upon a rolling, 12-month summation, and the actual individual HAP emissions during such period; and

e. any exceedance of the total combined HAPs facility-wide emission limitations of 24.9 tons per year based upon a rolling, 12-month summation, and the actual total combined HAPs emissions during such period.

The reports contained in this permit shall be submitted in accordance with the reporting

requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

2. The permittee shall also submit annual reports that summarize the actual annual emissions of VOC from this emissions unit. The reports shall include the emissions calculations and shall be submitted by January 31 of each year, and shall cover the previous calendar year.

3. The permittee shall submit annual reports that document any changes made to a parameter or value used in the dispersion model used to demonstrate compliance with ORC 3704.03(F) through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

E. Testing Requirement

1. Compliance with the allowable emission limitations in sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

   a. Emission Limitation:

      Each day that a photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] is employed, the OC emissions from all adhesives and from photochemically reactive cleanup materials shall not exceed 8 pounds per hour. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

      Applicable Compliance Method:

      Compliance with the hourly allowable OC emission limitation shall be determined based upon the record keeping requirements specified in section C.1 of this permit.

      If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

   b. Emission Limitation:

      Each day that a photochemically reactive material [as defined in OAC rule

3745-21-01(C)(5)] is employed, the OC emissions from all adhesives and from photochemically reactive cleanup materials shall not exceed 40 pounds per day. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

Applicable Compliance Method:

Compliance with the daily allowable OC emission limitation shall be determined based upon the record keeping requirements specified in section C.1 of this permit.

c. Emission Limitation:

Each day that photochemically reactive materials [as defined in OAC rule 3745-21-01(C)(5)] are not employed, the VOC emissions from adhesives and cleanup materials shall not exceed 3.87 pounds per hour, as a daily average.

Applicable Compliance Method:

Compliance with the hourly allowable VOC emission limitation shall be determined based upon the record keeping requirements specified in section C.2 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

d. Emission Limitation:

The VOC emissions from all VOC containing-material shall not exceed 17.0 tons per year.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in sections C.1, C.2, C.3 and C.4 of this permit.

e. Emission Limitation:

The VOC content of each adhesive shall not exceed 3.87 pounds per gallon, as

applied.

Applicable Compliance Method:

Any determination of VOC content, solids contents, or density of adhesive material or cleanup material shall be based on the adhesive materials as employed (as applied), including the addition of any thinner or viscosity reducer to the adhesives. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the adhesives or cleanup material by a certified environmental data sheet supplied by the manufacturer of the adhesive materials, or from data determined by an analysis of each adhesive, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular adhesive or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that adhesive or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

f. Emission Limitation:

Total facility-wide emissions shall not exceed 9.9 tons per year of each individual HAP, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section C.5 of this permit.

g. Emission Limitation:

Total facility-wide emissions shall not exceed 24.9 tons per year of total combined HAPs, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation above shall be based upon the record keeping requirements specified in section C.5 of this permit.

h. Emission Limitation:

In order to demonstrate compliance with the "Toxic Air Contaminant Statute", the director has established, per ORC 3704.03(F)(4)(c), a limit for hexane, which shall not exceed 26.33 pounds per day.

Applicable Compliance Method:

Compliance shall be based upon the formula below:

(CT) x (M) x (AT)

where:

CT = the gallons of adhesive applied per day (24 gallons is the maximum usage rate per this permit);

M = the mass of the coating, in pounds per gallon (6.65 lbs/gal is the current adhesive mass); and

AT = the percent, by weight, of air toxic compound in the adhesive (16.5% is the percent, by weight, of hexane in the current coating).

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05(C), the following terms and conditions of this permit to install are federally enforceable: A through F, except A.2.f, C.6, C.7, C.8 and D.3.

Mullet Cabinets Inc **Facility ID: 0238000104**
PTI Application: 02-22833
Issued: To be entered upon final issuance

Emissions Unit ID: **R006**

SIC CODE 2434 SCC CODE 40200710 EMISSIONS UNIT ID R006

EMISSIONS UNIT DESCRIPTION Laminate counter top manufacturing area including two HVLP pressure pots to apply adhesive.

DATE INSTALLED 1/01

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	3.69	2.27	3.87	17
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
3.87 lbs/gal and 3.87 lbs/hr and 17.0 tpy VOC emission when non PRM employed

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $none

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: hexane, cyclohexane and toluene