



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
HOLMES COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-18386

DATE: 9/25/2003

Walnut Creek Finishing
Leon Miller
PO Box 24
Walnut Creek, OH 44687

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Sincerely,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 9/25/2003
Effective Date: 9/25/2003**

FINAL PERMIT TO INSTALL 02-18386

Application Number: 02-18386
APS Premise Number: 0238000181
Permit Fee: **\$800**
Name of Facility: Walnut Creek Finishing
Person to Contact: Leon Miller
Address: PO Box 24
Walnut Creek, OH 44687

Location of proposed air contaminant source(s) [emissions unit(s)]:
**3468 State Route 39
Millersburg, Ohio**

Description of proposed emissions unit(s):
5 wood furniture coating lines.

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

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

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

Walnut Creek Finishing
PTI Application: 02-18386
Issued: 9/25/2003

Facility ID: 0238000181

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

Walnut Creek Finishing
PTI Application: 02-18386
Issued: 9/25/2003

Facility ID: 0238000181

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.

Walnut Creek Finishing
 PTI Application: 02-18386
 Issued: 9/25/2003

Facility ID: 0238000181

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

<u>Pollutant</u>	<u>Tons Per Year</u>
oc	80.0

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 - Booth 1 for the application of coating to wood furniture. Parts are air dried.	OAC rule 3745-31-05(A)(3)	See A.2.b 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 3745-31-05(D)	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 field 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 OC emissions from coatings and clean up materials shall not exceed 6.8 pounds per

8

Walnut

PTI A

Issued: 9/25/2003

Emissions Unit ID: **R001**

hour.

- 2.c** The OC emissions from all coatings and cleanup materials shall not exceed 13.5 tons per rolling, 12-month period.
- 2.d** The OC content of each coating shall not exceed 6.8 pounds per gallon, as applied.
- 2.e** Total emissions from emissions units R001, R002, R003 and R004, combined shall not exceed the following limits:
- i. 9.9 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation.
 - ii. 24.9 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 record keeping 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 in this emissions unit shall not exceed 3895 gallons per rolling, 12-month period.
3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month	Maximum Allowable VOC (tons)	Maximum Allowable Single HAP (tons)	Maximum Allowable Combined HAPs (tons)
1	1.1	0.8	2.0
2	2.2	1.7	4.2
3	3.3	2.5	6.2
4	4.5	3.3	8.3

5	5.6	4.1	10.4
6	6.8	5.0	12.5
7	7.9	5.8	14.5
8	9.0	6.6	16.6
9	10.1	7.4	18.7
10	11.3	8.3	20.8
11	12.4	9.1	22.8
12	13.5	9.9	24.9

4. After the first 12 calendar months of operation following the issuance of this permit, compliance with the rolling 12-month limitations of VOC, single hazardous air pollutant (HAP), and combined HAPs shall be based upon the rolling 12-month summations of the emissions of VOC, single HAP, and combined HAPs.

Tons VOC emissions current month for R001	+	Previous 11 months tons of VOC	Total 12-month < or = 13.5 tons VOC
Tons single HAP emissions current month for R001, R002, R003 and R004, combined	+	Previous 11 months tons single HAP	Total 12-month < or = 9.9 tons single HAP
Tons combined HAPs emissions current month for R001, R002, R003 and R004, combined	+	Previous 11 months tons combined HAPs	Total 12-month < or = 24.9 tons combined HAPs

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 the emissions unit is in operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the organic compound (OC) content of each coating and clean-up materials, in lbs/gallon;
 - d. the total OC emission rate for all coatings and clean-up materials, in lbs/day, i.e., sum of b times c;
 - e. the total number of hours the emissions unit was in operation; and

- f. the average hourly OC emission rate for all coatings and clean-up materials, i.e., (d)/(e), in lbs/hr.
3. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each organic compound material employed and each cleanup material;
 - b. documentation on whether or not each organic compound and cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
 - c. the total OC emissions from all coatings and cleanup materials employed, tons per month; and
 - d. the total number of gallons of coatings employed.
4. The permittee shall collect and record the following information for emissions units R001, R002, R003 and R004 combined each month:
 - a. the name and identification number of each coating, as applied;
 - b. the number of gallons of each coating employed;
 - 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 name and identification of each cleanup material employed;
 - f. the number of gallons of each cleanup material employed;
 - g. the single HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
 - h. 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 g);

- i. 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 b. times c. for each coating and the sum of f. times h. for each cleanup material for the previous 12 months); and
- j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of b. times d. for each coating plus the sum of f. times i. 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, and during the first 12 calendar months of operation following the issuance of the permit to install, the summation of single HAP emissions.
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, and during the first 12 calendar months of operation following the issuance of the permit to install, the summation of the total, combined HAP emissions.
7. The permittee shall record each month the rolling, 12-month summation of OC emissions from this emissions unit for the previous 12-month period, and during the first 12 calendar months of operation following the issuance of the permit to install, the summation of OC emissions.
8. The permittee shall record each month the rolling, 12-month summation of the total coating usage for this emissions unit for the previous 12-month period.
9. The permit to install for this emissions unit 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

Emissions Unit ID: R001

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):

TLV (mg/m³): 180

Maximum Hourly Emission Rate (lbs/hr): 8.4

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1423MAGLC (ug/m³): 3609

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 (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 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, in writing of any daily record showing that photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed in this emissions unit. The permittee shall identify the cause for the use of the photochemically reactive materials. 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. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day that the average OC emissions from the coatings and cleanup materials exceeded 6.8 lbs/hr in this emissions unit, 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 6.8 pounds per gallon in this emissions unit and the actual OC content of each such coating employed;
 - c. all exceedances of the rolling 12-month emissions limitation for each single HAP and, during the first 12 months of operation, all exceedances of each single HAP cumulative emission limitation for emissions units R001, R002, R003 and R004, combined;
 - d. all exceedances of the rolling, 12-month emissions limitation of total combined HAPs and, during the first 12 months of operation, all exceedances of total combined HAPs cumulative emission limitation for emissions unit R001, R002, R003 and R004, combined;
 - e. all exceedances of the rolling, 12-month emissions limitation for OC and, during the first 12 months of operation, the summation of OC emissions from this emissions unit; and
 - f. all exceedances of the rolling, 12-month coating usage limitation for this emissions unit.

The quarterly deviations reports shall be submitted in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

4. The permittee shall also submit annual reports that summarize the following information:
 - a. the emissions of OC from this emissions 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 in this emissions unit.

The reports shall include the emissions calculations, shall be submitted by January 31 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:
6.8 lbs OC emissions per hour

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:
13.5 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.7 based on the record keeping as specified in Section C.2.
 - c. Emissions Limitations:
9.9 tons of each single HAP, based upon a rolling, 12-month summation for R001, R002, R003 and R004, combined.

Walnut Creek Finishing
PTI Application: 02 10206
Issued

Facility ID: 0238000181

Emissions Unit ID: R001

Applicable Compliance Method:

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

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

Applicable Compliance Method:

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

- e. Emissions Limitation:
6.8 lbs OC/ gallon coating

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, except C.9, C.10 and C.11.

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 - Booth 2 for the application of coating to wood furniture. Coatings are air dried.	OAC rule 3745-31-05(A)(3)	See A.2.b 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 3745-31-05(D)	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 field 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 OC emissions from coatings and clean up materials shall not exceed 13.0 pounds per hour.

- 2.c** The OC emissions from all coatings and cleanup materials shall not exceed 26.0 tons per rolling, 12-month period.
- 2.d** The OC content of each coating shall not exceed 4.1 pounds per gallon, as applied.
- 2.e** Total emissions from emissions units R001, R002, R003 and R004, combined shall not exceed the following limits:
- i. 9.9 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation.
 - ii. 24.9 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 record keeping 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 in this emissions unit shall not exceed 3895 gallons per rolling, 12-month period.
3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month	Maximum Allowable VOC (tons)	Maximum Allowable Single HAP (tons)	Maximum Allowable Combined HAPs (tons)
1	2.2	0.8	2.0
2	4.3	1.7	4.2
3	6.5	2.5	6.2
4	8.7	3.3	8.3

Walnut Creek Finishing
PTI Application: 02-10206
Issued

Facility ID: 0238000181

Emissions Unit ID: **R002**

5	10.8	4.1	10.4
6	13.0	5.0	12.5
7	15.2	5.8	14.5
8	17.3	6.6	16.6
9	19.5	7.4	18.7
10	21.6	8.3	20.8
11	23.8	9.1	22.8
12	26.0	9.9	24.9

4. After the first 12 calendar months of operation following the issuance of this permit, compliance with the rolling 12-month limitations of VOC, single hazardous air pollutant (HAP), and combined HAPs shall be based upon the rolling 12-month summations of the emissions of VOC, single HAP, and combined HAPs.

Tons VOC emissions current month for R001	+	Previous 11 months tons of VOC	Total 12-month < or = 13.5 tons VOC
Tons single HAP emissions current month for R001, R002, R003 and R004, combined	+	Previous 11 months tons single HAP	Total 12-month < or = 9.9 tons single HAP
Tons combined HAPs emissions current month for R001, R002, R003 and R004, combined	+	Previous 11 months tons combined HAPs	Total 12-month < or = 24.9 tons combined HAPs

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 the emissions unit is in operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the organic compound (OC) content of each coating and clean-up materials, in lbs/gallon;
 - d. the total OC emission rate for all coatings and clean-up materials, in lbs/day, i.e., sum of b times c;
 - e. the total number of hours the emissions unit was in operation; and

- f. the average hourly OC emission rate for all coatings and clean-up materials, i.e., (d)/(e), in lbs/hr.
3. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each organic compound material employed and each cleanup material;
 - b. documentation on whether or not each organic compound and cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
 - c. the total OC emissions from all coatings and cleanup materials employed, tons per month; and
 - d. the total number of gallons of coatings employed.
4. The permittee shall collect and record the following information for emissions units R001, R002, R003 and R004 combined each month:
 - a. the name and identification number of each coating, as applied;
 - b. the number of gallons of each coating employed;
 - 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 name and identification of each cleanup material employed;
 - f. the number of gallons of each cleanup material employed;
 - g. the single HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
 - h. 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 g);

- i. 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 b. times c. for each coating and the sum of f. times h. for each cleanup material for the previous 12 months); and
- j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of b. times d. for each coating plus the sum of f. times i. 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, and during the first 12 calendar months of operation following the issuance of the permit to install, the summation of single HAP emissions.
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, and during the first 12 calendar months of operation following the issuance of the permit to install, the summation of the total, combined HAP emissions.
7. The permittee shall record each month the rolling, 12-month summation of OC emissions from this emissions unit for the previous 12-month period, and during the first 12 calendar months of operation following the issuance of the permit to install, the summation of OC emissions.
8. The permittee shall record each month the rolling, 12-month summation of the total coating usage for this emissions unit for the previous 12-month period.
9. The permit to install for this emissions unit 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

Emissions Unit ID: R002

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):

TLV (mg/m³): 180

Maximum Hourly Emission Rate (lbs/hr): 8.4

Predicted 1-Hour Maximum Ground-Level
 Concentration (ug/m³): 1423

MAGLC (ug/m³): 3609

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 (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.

Emissions Unit ID: R002

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 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, in writing of any daily record showing that photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed in this emissions unit. The permittee shall identify the cause for the use of the photochemically reactive materials. 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. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day that the average OC emissions from the coatings and cleanup materials exceeded 13.0 lbs/hr in this emissions unit, 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 4.1 pounds per gallon in this emissions unit and the actual OC content of each such coating employed;
 - c. all exceedances of the rolling 12-month emissions limitation for each single HAP and, during the first 12 months of operation, all exceedances of each single HAP cumulative emission limitation for emissions units R001, R002, R003 and R004, combined;
 - d. all exceedances of the rolling, 12-month emissions limitation of total combined HAPs and, during the first 12 months of operation, all exceedances of total combined HAPs cumulative emission limitation for emissions unit R001, R002, R003 and R004, combined;
 - e. all exceedances of the rolling, 12-month emissions limitation for OC and, during the first 12 months of operation, the summation of OC emissions from this emissions unit; and
 - f. all exceedances of the rolling, 12-month coating usage limitation for this emissions unit.

The quarterly deviations reports shall be submitted in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of

each year and shall cover the previous calendar quarters.

4. The permittee shall also submit annual reports that summarize the following information:
 - a. the emissions of OC from this emissions 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 in this emissions unit.

The reports shall include the emissions calculations, shall be submitted by January 31 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:
13.0 lbs OC emissions per hour

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:
26.0 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.7 based on the record keeping as specified in Section C.2.
 - c. Emissions Limitations:
9.9 tons of each single HAP, based upon a rolling, 12-month summation for R001, R002, R003 and R004, combined.

Walnut Creek Finishing
PTI Application: 02-10206
Issued

Facility ID: 0238000181

Emissions Unit ID: R002

Applicable Compliance Method:

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

d. Emissions Limitation:

24.9 tons per year of total combined HAPs, based upon a rolling, 12-month summation for R001, R002, R003 and R004, combined.

Applicable Compliance Method:

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

e. Emissions Limitation:

4.1 lbs OC/ gallon coating

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.

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, except C.9, C.10 and C.11.

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 - Booth 3 for the spray application of coating to wood furniture. Coatings are air dried.	OAC rule 3745-31-05(A)(3)	See A.2.b 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 3745-31-05(D)	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 field 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.

30

Walnut

PTI A

Issued: 9/25/2003

Emissions Unit ID: **R003**

- 2.b** The OC emissions from coatings and clean up materials shall not exceed 13.0 pounds per hour.

- 2.c** The OC emissions from all coatings and cleanup materials shall not exceed 26.0 tons per rolling, 12-month period.
- 2.d** The OC content of each coating shall not exceed 4.1 pounds per gallon, as applied.
- 2.e** Total emissions from emissions units R001, R002, R003 and R004, combined shall not exceed the following limits:
- i. 9.9 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation.
 - ii. 24.9 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 record keeping 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 in this emissions unit shall not exceed 3895 gallons per rolling, 12-month period.
3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month	Maximum Allowable VOC (tons)	Maximum Allowable Single HAP (tons)	Maximum Allowable Combined HAPs (tons)
1	2.2	0.8	2.0
2	4.3	1.7	4.2
3	6.5	2.5	6.2
4	8.7	3.3	8.3

Walnut Creek Finishing
PTI Application: 02-10206
Issued

Facility ID: 0238000181

Emissions Unit ID: R003

5	10.8	4.1	10.4
6	13.0	5.0	12.5
7	15.2	5.8	14.5
8	17.3	6.6	16.6
9	19.5	7.4	18.7
10	21.6	8.3	20.8
11	23.8	9.1	22.8
12	26.0	9.9	24.9

4. After the first 12 calendar months of operation following the issuance of this permit, compliance with the rolling 12-month limitations of VOC, single hazardous air pollutant (HAP), and combined HAPs shall be based upon the rolling 12-month summations of the emissions of VOC, single HAP, and combined HAPs.

Tons VOC emissions current month for R001	+	Previous 11 months tons of VOC	Total 12-month < or = 13.5 tons VOC
Tons single HAP emissions current month for R001, R002, R003 and R004, combined	+	Previous 11 months tons single HAP	Total 12-month < or = 9.9 tons single HAP
Tons combined HAPs emissions current month for R001, R002, R003 and R004, combined	+	Previous 11 months tons combined HAPs	Total 12-month < or = 24.9 tons combined HAPs

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 the emissions unit is in operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the organic compound (OC) content of each coating and clean-up materials, in lbs/gallon;
 - d. the total OC emission rate for all coatings and clean-up materials, in lbs/day, i.e., sum of b times c;
 - e. the total number of hours the emissions unit was in operation; and

- f. the average hourly OC emission rate for all coatings and clean-up materials, i.e., (d)/(e), in lbs/hr.
3. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each organic compound material employed and each cleanup material;
 - b. documentation on whether or not each organic compound and cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
 - c. the total OC emissions from all coatings and cleanup materials employed, tons per month; and
 - d. the total number of gallons of coatings employed.
4. The permittee shall collect and record the following information for emissions units R001, R002, R003 and R004 combined each month:
 - a. the name and identification number of each coating, as applied;
 - b. the number of gallons of each coating employed;
 - 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 name and identification of each cleanup material employed;
 - f. the number of gallons of each cleanup material employed;
 - g. the single HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;
 - h. the total combined HAP content of each cleanup material in pounds of combined HAPs

Emissions Unit ID: R003

per gallon of cleanup material, as applied (sum all the individual HAP contents from g);

- i. 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 b. times c. for each coating and the sum of f. times h. for each cleanup material for the previous 12 months); and
- j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of b. times d. for each coating plus the sum of f. times i. 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, and during the first 12 calendar months of operation following the issuance of the permit to install, the summation of single HAP emissions.
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, and during the first 12 calendar months of operation following the issuance of the permit to install, the summation of the total, combined HAP emissions.
7. The permittee shall record each month the rolling, 12-month summation of OC emissions from this emissions unit for the previous 12-month period, and during the first 12 calendar months of operation following the issuance of the permit to install, the summation of OC emissions.
8. The permittee shall record each month the rolling, 12-month summation of the total coating usage for this emissions unit for the previous 12-month period.
9. The permit to install for this emissions unit 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):

TLV (mg/m³): 180

Maximum Hourly Emission Rate (lbs/hr): 8.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1423

MAGLC (ug/m³): 3609

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 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.

Emissions Unit ID: R003

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 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, in writing of any daily record showing that photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed in this emissions unit. The permittee shall identify the cause for the use of the photochemically reactive materials. 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. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day that the average OC emissions from the coatings and cleanup materials exceeded 13.0 lbs/hr in this emissions unit, and the actual average OC emissions for each such day;
 - b. an identification of each month that the OC content of any coating exceeded 4.1 pounds per gallon in this emissions unit and the actual OC content of each such coating employed;
 - c. all exceedances of the rolling 12-month emissions limitation for each single HAP and, during the first 12 months of operation, all exceedances of each single HAP cumulative emission limitation for emissions units R001, R002, R003 and R004, combined;
 - d. all exceedances of the rolling, 12-month emissions limitation of total combined HAPs and, during the first 12 months of operation, all exceedances of total combined HAPs cumulative emission limitation for emissions unit R001, R002, R003 and R004, combined;
 - e. all exceedances of the rolling, 12-month emissions limitation for OC and, during the first 12 months of operation, the summation of OC emissions from this emissions unit; and
 - f. all exceedances of the rolling, 12-month coating usage limitation for this emissions unit.

The quarterly deviations reports shall be submitted in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Walnut Creek Finishing
PTI Application: 02 10206
Issued

Facility ID: 0238000181

Emissions Unit ID: R003

4. The permittee shall also submit annual reports that summarize the following information:
 - a. the emissions of OC from this emissions unit;

Emissions Unit ID: **R003**

- 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 in this emissions unit.

The reports shall include the emissions calculations, shall be submitted by January 31 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:
13.0 lbs OC emissions per hour

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:
26.0 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.7 based on the record keeping as specified in Section C.2.
 - c. Emissions Limitations:
9.9 tons of each single HAP, based upon a rolling, 12-month summation for R001, R002, R003 and R004, combined.

Applicable Compliance Method:
Compliance shall be based on the record keeping as specified in Sections C.4.i and C.5.
 - d. Emissions Limitation:
24.9 tons per year of total combined HAPs, based upon a rolling, 12-month summation for R001, R002, R003 and R004, combined.

Applicable Compliance Method:

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

- e. Emissions Limitation:
4.1 lbs OC/ gallon coating

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.

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, except C.9, C.10 and C.11.

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>
R004 - Booth 4 for the spray application of coating to wood furniture. Coatings are air dried.	OAC rule 3745-31-05(A)(3)	See A.2.b 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 3745-31-05(D)	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 field 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.

Walnut Creek Finishing
PTI Application: 02 10206
Issued

Facility ID: 0238000181

Emissions Unit ID: **R004**

- 2.b** The OC emissions from coatings and clean up materials shall not exceed 13.0 pounds per hour.

- 2.c** The OC emissions from all coatings and cleanup materials shall not exceed 14.5 tons per rolling, 12-month period.
- 2.d** The OC content of each coating shall not exceed 6.8 pounds per gallon, as applied.
- 2.e** Total emissions from emissions units R001, R002, R003 and R004, combined shall not exceed the following limits:
- i. 9.9 tons per year of each single hazardous air pollutant (HAP), based upon a rolling, 12-month summation.
 - ii. 24.9 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 record keeping 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 in this emissions unit shall not exceed 4,183 gallons per rolling, 12-month period.
3. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Month	Maximum Allowable VOC (tons)	Maximum Allowable Single HAP (tons)	Maximum Allowable Combined HAPs (tons)
1	1.2	0.8	2.0
2	2.4	1.7	4.2
3	3.6	2.5	6.2
4	4.8	3.3	8.3

5	6.0	4.1	10.4
6	7.3	5.0	12.5
7	8.5	5.8	14.5
8	9.7	6.6	16.6
9	10.9	7.4	18.7
10	12.1	8.3	20.8
11	13.3	9.1	22.8
12	14.5	9.9	24.9

4. After the first 12 calendar months of operation following the issuance of this permit, compliance with the rolling 12-month limitations of VOC, single hazardous air pollutant (HAP), and combined HAPs shall be based upon the rolling 12-month summations of the emissions of VOC, single HAP, and combined HAPs.

Tons VOC emissions current month for R001	+	Previous 11 months tons of VOC	Total 12-month < or = 13.5 tons VOC
Tons single HAP emissions current month for R001, R002, R003 and R004, combined	+	Previous 11 months tons single HAP	Total 12-month < or = 9.9 tons single HAP
Tons combined HAPs emissions current month for R001, R002, R003 and R004, combined	+	Previous 11 months tons combined HAPs	Total 12-month < or = 24.9 tons combined HAPs

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 the emissions unit is in operation:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating employed;
 - c. the organic compound (OC) content of each coating and clean-up materials, in lbs/gallon;
 - d. the total OC emission rate for all coatings and clean-up materials, in lbs/day, i.e., sum of b times c;

- e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate for all coatings and clean-up materials, i.e., (d)/(e), in lbs/hr.
3. The permittee shall collect and record the following information for each month for this emissions unit:
- a. the company identification for each organic compound material employed and each cleanup material;
 - b. documentation on whether or not each organic compound and cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
 - c. the total OC emissions from all coatings and cleanup materials employed, tons per month; and
 - d. the total number of gallons of coatings employed.
4. The permittee shall collect and record the following information for emissions units R001, R002, R003 and R004 combined each month:
- a. the name and identification number of each coating, as applied;
 - b. the number of gallons of each coating employed;
 - 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 name and identification of each cleanup material employed;
 - f. the number of gallons of each cleanup material employed;
 - g. the single HAP content for each HAP of each cleanup material in pounds of individual HAP per gallon of cleanup material, as applied;

- h. 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 g);
- i. 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 b. times c. for each coating and the sum of f. times h. for each cleanup material for the previous 12 months); and
- j. the total combined HAP emissions from all coatings and cleanup materials employed, in pounds or tons per month (the sum of b. times d. for each coating plus the sum of f. times i. 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, and during the first 12 calendar months of operation following the issuance of the permit to install, the summation of single HAP emissions.
- 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, and during the first 12 calendar months of operation following the issuance of the permit to install, the summation of the total, combined HAP emissions.
- 7. The permittee shall record each month the rolling, 12-month summation of OC emissions from this emissions unit for the previous 12-month period, and during the first 12 calendar months of operation following the issuance of the permit to install, the summation of OC emissions.
- 8. The permittee shall record each month the rolling, 12-month summation of the total coating usage for this emissions unit for the previous 12-month period.
- 9. The permit to install for this emissions unit 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):

TLV (mg/m³): 180

Maximum Hourly Emission Rate (lbs/hr): 8.4

Predicted 1-Hour Maximum Ground-Level
Concentration (ug/m³): 1423

MAGLC (ug/m³): 3609

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 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.

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 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, in writing of any daily record showing that photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed in this emissions unit. The permittee shall identify the cause for the use of the photochemically reactive materials. 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. The permittee shall submit quarterly deviation (excursion) reports that include the following information:
 - a. an identification of each day that the average OC emissions from the coatings and cleanup materials exceeded 13.0 lbs/hr in this emissions unit, and the actual average OC emissions for each such day;
 - b. an identification of each month that the OC content of any coating exceeded 6.8 pounds per gallon in this emissions unit and the actual OC content of each such coatings employed;
 - c. all exceedances of the rolling 12-month emissions limitation for each single HAP and, during the first 12 months of operation, all exceedances of each single HAP cumulative emission limitation for emissions units R001, R002, R003 and R004, combined;
 - d. all exceedances of the rolling, 12-month emissions limitation of total combined HAPs and, during the first 12 months of operation, all exceedances of total combined HAPs cumulative emission limitation for emissions unit R001, R002, R003 and R004, combined;
 - e. all exceedances of the rolling, 12-month emissions limitation for OC and, during the first 12 months of operation, the summation of OC emissions from this emissions unit; and
 - f. all exceedances of the rolling, 12-month coating usage limitation for this emissions unit.

The quarterly deviations reports shall be submitted in accordance with the General Terms and Conditions. These reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Walnut Creek Finishing
PTI Application: 02 10206
Issued

Facility ID: 0238000181

Emissions Unit ID: R004

4. The permittee shall also submit annual reports that summarize the following information:
 - a. the emissions of OC from this emissions 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 in this emissions unit.

The reports shall include the emissions calculations, shall be submitted by January 31 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:
13.0 lbs OC emissions per hour

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:
14.5 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.7 based on the record keeping as specified in Section C.2.
 - c. Emissions Limitations:
9.9 tons of each single HAP, based upon a rolling, 12-month summation for R001, R002, R003 and R004, combined.

Applicable Compliance Method:
Compliance shall be based on the record keeping as specified in Sections C.4.i and C.5.
 - d. Emissions Limitation:
24.9 tons per year of total combined HAPs, based upon a rolling, 12-month summation

for R001, R002, R003 and R004, combined.

Applicable Compliance Method:

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

- e. Emissions Limitation:
6.8 lbs OC/ gallon coating

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.

- 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, except C.9, C.10 and C.11.