



Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

9/28/2011

Mr. Tim More
MASCO Cabinetry, Middlefield LLC (KraftMaid Plant 2)
15535 S STATE AVE
P.O Box 1055
Middlefield, OH 44062

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0228000213
Permit Number: P0084581
Permit Type: Renewal
County: Geauga

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NEDO



FINAL

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

MASCO Cabinetry, Middlefield LLC (KraftMaid Plant 2)

Facility ID:	0228000213
Permit Number:	P0084581
Permit Type:	Renewal
Issued:	9/28/2011
Effective:	9/28/2011
Expiration:	5/18/2014



Division of Air Pollution Control
Permit-to-Install and Operate
for
MASCO Cabinetry, Middlefield LLC (KraftMaid Plant 2)

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Authorization

Facility ID: 0228000213
Application Number(s): A0015148, A0041350
Permit Number: P0084581
Permit Description: Renewal FEPTIO of 7 wooden cabinet coating operations to restrict HAP and VOC emissions
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 9/28/2011
Effective Date: 9/28/2011
Expiration Date: 5/18/2014
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

MASCO Cabinetry, Middlefield LLC (KraftMaid Plant 2)
15535 S STATE AVE
MIDDLEFIELD, OH 44062

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

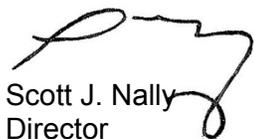
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Scott J. Nally
Director



Authorization (continued)

Permit Number: P0084581

Permit Description: Renewal FEPTIO of 7 wooden cabinet coating operations to restrict HAP and VOC emissions

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

Emissions Unit ID:	K001
Company Equipment ID:	UV Coating Line #3
Superseded Permit Number:	02-19306
General Permit Category and Type:	Not Applicable

Group Name: Roller Coaters

Emissions Unit ID:	R001
Company Equipment ID:	UV Stain Roll Coat Line
Superseded Permit Number:	02-13185
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R003
Company Equipment ID:	UV Topcoat Roll Coater
Superseded Permit Number:	02-13185
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R009
Company Equipment ID:	UV Roll Coat Line No. 2
Superseded Permit Number:	02-13185
General Permit Category and Type:	Not Applicable

Group Name: Spray Coaters

Emissions Unit ID:	R004
Company Equipment ID:	UV Toner Molding Finish Line Spray Coater
Superseded Permit Number:	02-13185
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R005
Company Equipment ID:	UV Stain Molding Finish Line Spray Coater
Superseded Permit Number:	02-13185
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	R007
Company Equipment ID:	UV Molding Topcoat Spray Coater
Superseded Permit Number:	02-13185
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions

1. K001, UV Coating Line #3

Operations, Property and/or Equipment Description:

UV Line Number 3 using air assisted and airless methods of coating application

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. b)(1)d and d)(6)
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. b)(1)b, d)(3), e)(1), f)(1)c and f)(1)d
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI No. 02-19306 for emissions unit K001	VOC emissions from the use of facility-wide cleanup, touchup and support materials shall not exceed 1367 pounds per month and 7.9 tons per year. See b)(2)a
b.	OAC rule 3745-31-05(D)(1)	Facility-wide emissions of any individual hazardous air pollutant (HAP) shall not exceed 4.4 tons per rolling, 12-month period. Facility-wide emissions of total combined HAPs shall not exceed 11.5 tons per rolling, 12-month period.
c.	OAC rule 3745-21-15	See b)(2)b, b)(2)c, b)(2)d, d)(4), d)(5), and e)(2).
d.	OAC rule 3745-114-01	See d)(6).

e.	40 CFR Part63, Subpart JJ – National Emissions Standards for Hazardous Air Pollutant Emissions from Wood Furniture Manufacturing Operations	See b)(2)e.
f.	OAC rule 3745-17-11(C)	See c)(1), c)(2), d)(7) d)(8), d)(9), d)(10), and d)(11).

(2) Additional Terms and Conditions

- a. Volatile organic compounds (VOC) emissions from coatings shall not 27.4 pounds per day and 5 ton per year for this emissions unit.
- b. The permittee shall comply with the following limitations:
 - i. the VOC content of any topcoat shall not exceed 0.8 pound of VOC per pound of solids, as applied; and
 - ii. there is no VOC content limit for sealers, stains, basecoats, and washcoats in accordance with OAC rule 3745-21-15(D)(1)(b).
- c. The permittee shall prepare and maintain a written work practice implementation plan. The plan shall define environmentally desirable work practices for each wood furniture manufacturing operation and address each of the work practices contained in paragraphs (b) to (d) and (f) to (k) of 40 CFR 63.803.
- d. This rule shall become federally enforceable on the date the U.S. EPA approves this rule as a revision to the Ohio SIP for ozone.
- e. This facility is not an affected source subject to the requirements of 40 CFR Part 63, Subpart JJ, because it is a major source, as defined in 40 CFR §63.2, for individual or total combined HAPs. The permittee shall not exceed the HAP emission limitations contained in this permit without first obtaining a permit modification.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer’s recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event the particulate filter system is not operating in accordance with the manufacturer’s recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to determine daily VOC emissions, the permittee shall collect and record the following information each day for each emissions unit:
 - a. the company identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon; and
 - d. the total VOC emission rate for all coatings employed each day, calculated as the sum of "b x c" for each coating employed.

- (2) In order to determine monthly facility-wide VOC emissions from the use of cleanup, touchup, and support materials, the permittee shall collect and record the following facility-wide information each month:
 - a. the company identification of each such material employed;
 - b. the number of gallons of each such material employed;
 - c. the VOC content of each such material employed, in pounds per gallon; and
 - d. the total VOC emission rate from the use of all such materials, calculated as the sum of "b x c" for each such material, in pounds per month.

- (3) In order to determine the rolling, 12-month emissions of HAP, the permittee shall collect and record the following facility-wide information each month:
 - a. the company identification for each coating, cleanup, touchup and support material employed;
 - b. the individual HAP content for each such material in pounds of individual HAP per gallon material employed, as applied;
 - c. the total combined HAPs content for each such material employed, as applied;
 - d. the number of gallons of each such material employed;
 - e. the monthly emissions of each individual HAP, calculated as the sum of "b x d" for each such material employed;
 - f. the rolling, 12-month summation of each individual HAP emissions facility-wide, in tons;
 - g. the monthly emissions of total combined HAPs, calculated as the sum of "c x d" for each such material employed; and
 - h. the rolling, 12-month summation of total combined HAPs emissions facility-wide, in tons.

- (4) The permittee shall employ the following procedures for determining the VOC content and solids content of a coating.
- a. The as-applied VOC content of a finishing material that is applied by a continuous coater shall be determined by the VOC content of the finishing material in the reservoir and the VOC content as calculated from records.
 - b. The VOC content and solids content of a coating shall be determined in accordance with paragraph (B) of OAC rule 3745-21-10 wherein formulation data or USEPA Method 24 procedures (which include various ASTM measurement methods) may be employed.
 - c. A certified product data sheet that provides data on VOC content and solids content shall be used by the permittee provided that any data based upon a measurement method shall be a measurement method that meets paragraph (I) of OAC rule 3745-21-15.
- (5) All records required under OAC rule 3745-21-15(K) shall be retained for a period of not less than five years and shall be made available to the Director or any authorized representative of the director for review during normal business hours. The following types of records are to be maintained.
- a. Compliance demonstration records for finishing operations:
 - i. a record of the VOC emission requirement elected to be met under any one paragraph of paragraphs (D)(1) to (D)(5) of OAC rule 3745-21-15 for each day of operation of the finishing operation;
 - ii. a certified product data sheet for each finishing material that is subject to a VOC emission requirement elected to be met under paragraph (K)(2)(a) of OAC rule 3745-21-15, and a certified product data sheet for any thinners or other VOC material added to the finishing materials before application; and
 - iii. a record of the VOC content, in pounds of VOC per pound of solids, as applied, of each finishing material, other than a stain, that is subject to a VOC content limit or a daily VOC emissions limit under paragraph (D) of OAC rule 3745-21-15, including documentation on any thinner or other VOC added to the finishing material before application.
 - iv. records pertaining to VOC content for a continuous coater in accordance with OAC rule 3745-21-15(K)(2)(e)(i):
 - (a) for each day of operation, the gallons of each material (finishing material and thinner) added to the continuous coater reservoir.
 - (b) for each day of operation, the VOC content of the finishing material in the reservoir and the VOC content as calculated from records.

- b. Work practice implementation plan records:
 - i. records demonstrating that the operator training program required by 40 CFR 63.803(b) is in place;
 - ii. records collected in accordance with the inspection and maintenance plan required by 40 CFR 63.803(c);
 - iii. records associated with the cleaning solvent accounting system required by 40 CFR 63.803(d);
 - iv. records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semi-annual period as required by 40 CFR 63.803(h); and
 - v. copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

- (6) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

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

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

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

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

- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

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

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. any month in which the facility-wide emissions of any individual HAP exceeded 4.4 tons per rolling, 12-month period and the actual facility-wide emissions of any such HAP in each such month; and
 - ii. any month in which the facility-wide emissions of total combined HAPs exceeded 11.5 tons per rolling, 12-month period and the actual facility-wide emissions of total combined HAPs in each such month.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit semiannual compliance status reports concerning the requirements specified in OAC rule 3745-21-15 no later than thirty calendar days after the end of each six-month period to the Ohio EPA Northeast District Office. Reports shall be submitted no later than thirty calendar days after the end of each six-month period following the first report. For each semiannual compliance status report, the permittee shall submit the following information for the six-month period covered by the report:
- a. For any finishing operation subject to paragraph (D) of OAC rule 3745-21-15, any changes to the previous reporting of which paragraph of paragraphs (D)(1) to (D)(5) of OAC rule 3745-21-15 is elected to be met.
 - b. For any topcoat or sealer that is applied by means of a continuous coater, any changes to the means of compliance previously reported. If the change pertains to the use of the procedures of paragraph (I)(5)(b) of OAC rule 3745-21-15 for the VOC content and viscosity measurements of a continuous coater, data that demonstrates the correlation between the viscosity of the finishing material and the VOC content of the finishing material in the reservoir.
 - c. Compliance certification for semiannual reporting period including the following compliance certifications, where applicable:
 - i. For any topcoat or sealer that is subject to the VOC content limit of paragraph (D)(1), (D)(2), (D)(4)(b), or (D)(5)(b) of OAC rule 3745-21-15 and that complies by the procedures of paragraphs (I)(1) to (I)(4) of OAC rule 3745-21-15, the compliance certification shall state that compliant coatings for topcoats and sealers, as applicable, have been used each operating day in the semiannual reporting period, or should otherwise identify the periods of use of noncompliant coatings for topcoats and sealers, as applicable, the reasons for the use of noncompliant coatings, and the amounts and VOC contents of each noncompliant coating used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.
 - ii. For any topcoat or sealer that is applied by means of a continuous coater, that is subject to the VOC content limit of paragraph (D)(1), (D)(2), (D)(4)(b), or (D)(5)(b) of OAC rule 3745-21-15, and that complies by the procedures of paragraph (I)(5) of OAC rule 3745-21-15, the compliance certification shall state the following, whichever is applicable:
 - (a) The compliance certification shall state that compliant coatings, as determined by the procedures of paragraph (I)(5)(a) of OAC rule 3745-21-15, have been used each operating day in the semiannual reporting period, or should otherwise identify the periods of use of noncompliant coatings, the reasons for the use of noncompliant coatings, and the amounts and VOC contents of each noncompliant coating used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used

- (b) The compliance certification shall state that compliant coatings, as determined by the procedures of paragraph (I)(5)(b) of OAC rule 3745-21-15, have been used each operating day in the semiannual reporting period, or should otherwise identify the periods of use of noncompliant coatings, the reasons for the use of noncompliant coatings, and the amounts and VOC contents of each noncompliant coating used. Additionally, the certification shall state that the viscosity of the finishing material in the reservoir has not been less than the viscosity of the initial finishing material, that is, the material that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.
 - iii. For wood furniture manufacturing operations subject to the work practice requirements of paragraph (F) of OAC rule 3745-21-15, the compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented.
 - iv. The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification.
 - v. The compliance certification shall be signed by a responsible official of the company that owns or operates the wood furniture manufacturing operations.
 - (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- f) **Testing Requirements**
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Volatile organic compounds (VOC) emissions from coatings shall not exceed 27.4 pounds per day and 5 tons per year for this emissions unit.

Applicable Compliance Methods:

Compliance with the daily limitation shall be demonstrated through the record keeping requirements specified in d)(1)d. Compliance with the annual limitation shall be demonstrated by summing the daily emissions for the emissions unit for the calendar year.

b. Emission Limitations:

VOC emissions from the use of facility-wide cleanup, touchup and support materials shall not exceed 1367 pounds per month and 7.9 tons per year.

Applicable Compliance Methods:

Compliance with the monthly limitation shall be demonstrated through the record keeping requirements specified in d)(2)d. Compliance with the annual limitation shall be demonstrated by summing the facility-wide monthly emissions.

c. Emission Limitations:

Facility-wide emissions of any individual HAP shall not exceed 4.4 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in d)(3)f.

d. Emission Limitation:

Facility-wide emissions of total combined HAPs shall not exceed 11.5 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in d)(3)h.

e. Emission Limitation:

The VOC content of any topcoat shall not exceed 0.8 pound of VOC per pound of solids, as applied.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in d)(4) and d)(5).

g) Miscellaneous Requirements

- (1) None.

2. Emissions Unit Group -Roller Coaters: R001, R003, and R009

EU ID	Operations, Property and/or Equipment Description
R001	UV stain roll coating line
R003	UV topcoat roller coater
R009	UV roll coat line #2

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d and d)(6)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b, d)(3), e)(1), f)(1)c and f)(1)d

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI No. 02-13185 for emissions units R001, R003, and R009	VOC emissions from the use of facility-wide cleanup, touchup and support materials shall not exceed 1367 pounds per month and 7.9 tons per year. See b)(2)a
b.	OAC rule 3745-31-05(D)(1)	Facility-wide emissions of any individual hazardous air pollutant (HAP) shall not exceed 4.4 tons per rolling, 12-month period. Facility-wide emissions of total combined HAPs shall not exceed 11.5 tons per rolling, 12-month period.
c.	OAC rule 3745-21-15	See b)(2)b, b)(2)c, b)(2)dc, d)(4), d)(5), and e)(2).

d.	OAC rule 3745-114-01	See d)(6).
e.	40 CFR Part 63, Subpart JJ – National Emissions Standards for Hazardous Air Pollutant Emissions from Wood Furniture Manufacturing Operations	See b)(2)e.

(2) Additional Terms and Conditions

- a. Volatile organic compounds (VOC) emissions from coatings shall not exceed the following:
 - i. Emissions unit R003, 5.0 pounds per day and 0.9 ton per year;
 - ii. Emissions unit R009, 2.4 pounds per day and 0.4 ton per year;
 - iii. Emissions unit R001, 83.5 pounds per day and 15.2 ton per year.
- b. The permittee shall comply with the following limitations:
 - i. the VOC content of any topcoat shall not exceed 0.8 pound of VOC per pound of solids, as applied.
 - ii. there is no VOC content limit for sealers, stains, basecoats, and washcoats in accordance with OAC rule 3745-21-15(D)(1)(b).
- c. The permittee shall prepare and maintain a written work practice implementation plan. The plan shall define environmentally desirable work practices for each wood furniture manufacturing operation and address each of the work practices contained in paragraphs (b) to (d) and (f) to (k) of 40 CFR 63.803.
- d. This rule shall become federally enforceable on the date the U.S. EPA approves this rule as a revision to the Ohio SIP for ozone.
- e. This facility is not an affected source subject to the requirements of 40 CFR Part 63, Subpart JJ, because it is a major source, as defined in 40 CFR §63.2, for individual or total combined HAPs. The permittee shall not exceed the HAP emission limitations contained in this permit without first obtaining a permit modification.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) In order to determine daily VOC emissions, the permittee shall collect and record the following information each day for each emissions unit:

- a. the company identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon; and
 - d. the total VOC emission rate for all coatings employed each day, calculated as the sum of "b x c" for each coating employed.
- (2) In order to determine monthly facility-wide VOC emissions from the use of cleanup, touchup, and support materials, the permittee shall collect and record the following facility-wide information each month:
- a. the company identification of each such material employed;
 - b. the number of gallons of each such material employed;
 - c. the VOC content of each such material employed, in pounds per gallon; and
 - d. the total VOC emission rate from the use of all such materials, calculated as the sum of "b x c" for each such material, in pounds per month.
- (3) In order to determine the rolling, 12-month emissions of HAP, the permittee shall collect and record the following facility-wide information each month:
- a. the company identification for each coating, cleanup, touchup and support material employed;
 - b. the individual HAP content for each such material in pounds of individual HAP per gallon material employed, as applied;
 - c. the total combined HAPs content for each such material employed, as applied;
 - d. the number of gallons of each such material employed;
 - e. the monthly emissions of each individual HAP, calculated as the sum of "b x d" for each such material employed;
 - f. the rolling, 12-month summation of each individual HAP emissions facility-wide, in tons;
 - g. the monthly emissions of total combined HAPs, calculated as the sum of "c x d" for each such material employed; and
 - h. the rolling, 12-month summation of total combined HAPs emissions facility-wide, in tons.
- (4) The permittee shall employ the following procedures for determining the VOC content and solids content of a coating.

- a. The as-applied VOC content of a finishing material that is applied by a continuous coater shall be determined by the VOC content of the finishing material in the reservoir and the VOC content as calculated from records.
 - b. The VOC content and solids content of a coating shall be determined in accordance with paragraph (B) of OAC rule 3745-21-10 wherein formulation data or USEPA Method 24 procedures (which include various ASTM measurement methods) may be employed.
 - c. A certified product data sheet that provides data on VOC content and solids content shall be used by the permittee provided that any data based upon a measurement method shall be a measurement method that meets paragraph (I) of OAC rule 3745-21-15.
- (5) All records required under OAC rule 3745-21-15(K) shall be retained for a period of not less than five years and shall be made available to the Director or any authorized representative of the director for review during normal business hours. The following types of records are to be maintained.
- a. Compliance demonstration records for finishing operations:
 - i. a record of the VOC emission requirement elected to be met under any one paragraph of paragraphs (D)(1) to (D)(5) of OAC rule 3745-21-15 for each day of operation of the finishing operation;
 - ii. a certified product data sheet for each finishing material that is subject to a VOC emission requirement elected to be met under paragraph (K)(2)(a) of OAC rule 3745-21-15, and a certified product data sheet for any thinners or other VOC material added to the finishing materials before application; and
 - iii. a record of the VOC content, in pounds of VOC per pound of solids, as applied, of each finishing material, other than a stain, that is subject to a VOC content limit or a daily VOC emissions limit under paragraph (D) of OAC rule 3745-21-15, including documentation on any thinner or other VOC added to the finishing material before application.
 - iv. records pertaining to VOC content for a continuous coater in accordance with OAC rule 3745-21-15(K)(2)(e)(i):
 - (a) for each day of operation, the gallons of each material (finishing material and thinner) added to the continuous coater reservoir.
 - (b) for each day of operation, the VOC content of the finishing material in the reservoir and the VOC content as calculated from records.
 - b. Work practice implementation plan records:

- i. records demonstrating that the operator training program required by 40 CFR 63.803(b) is in place;
 - ii. records collected in accordance with the inspection and maintenance plan required by 40 CFR 63.803(c);
 - iii. records associated with the cleaning solvent accounting system required by 40 CFR 63.803(d);
 - iv. records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semi-annual period as required by 40 CFR 63.803(h); and
 - v. copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- (6) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. any month in which the facility-wide emissions of any individual HAP exceeded 4.4 tons per rolling, 12-month period and the actual facility-wide emissions of any such HAP in each such month; and
 - ii. any month in which the facility-wide emissions of total combined HAPs exceeded 11.5 tons per rolling, 12-month period and the actual facility-wide emissions of total combined HAPs in each such month.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit semiannual compliance status reports concerning the requirements specified in OAC rule 3745-21-15 no later than thirty calendar days after the end of each six-month period to the Ohio EPA Northeast District Office. Reports shall be submitted no later than thirty calendar days after the end of each six-month period following the first report. For each semiannual compliance status report, the permittee shall submit the following information for the six-month period covered by the report:
- a. For any finishing operation subject to paragraph (D) of OAC rule 3745-21-15, any changes to the previous reporting of which paragraph of paragraphs (D)(1) to (D)(5) of OAC rule 3745-21-15 is elected to be met.
 - b. For any topcoat or sealer that is applied by means of a continuous coater, any changes to the means of compliance previously reported. If the change pertains to the use of the procedures of paragraph (I)(5)(b) of OAC rule 3745-21-15 for the VOC content and viscosity measurements of a continuous coater, data that demonstrates the correlation between the viscosity of the finishing material and the VOC content of the finishing material in the reservoir.
 - c. Compliance certification for semiannual reporting period including the following compliance certifications, where applicable:
 - i. For any topcoat or sealer that is subject to the VOC content limit of paragraph (D)(1), (D)(2), (D)(4)(b), or (D)(5)(b) of OAC rule 3745-21-15 and that complies by the procedures of paragraphs (I)(1) to (I)(4) of OAC rule 3745-21-15, the compliance certification shall state that compliant coatings for topcoats and sealers, as applicable, have been used each operating day in the semiannual reporting period, or should otherwise identify the periods of use of noncompliant coatings for topcoats and sealers, as applicable, the reasons for the use of noncompliant coatings, and the amounts and VOC contents of each noncompliant coating used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.
 - ii. For any topcoat or sealer that is applied by means of a continuous coater, that is subject to the VOC content limit of paragraph (D)(1), (D)(2), (D)(4)(b), or (D)(5)(b) of OAC rule 3745-21-15, and that complies by the procedures of paragraph (I)(5) of OAC rule 3745-21-15, the compliance certification shall state the following, whichever is applicable:

- (a) The compliance certification shall state that compliant coatings, as determined by the procedures of paragraph (I)(5)(a) of OAC rule 3745-21-15, have been used each operating day in the semiannual reporting period, or should otherwise identify the periods of use of noncompliant coatings, the reasons for the use of noncompliant coatings, and the amounts and VOC contents of each noncompliant coating used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used
 - (b) The compliance certification shall state that compliant coatings, as determined by the procedures of paragraph (I)(5)(b) of OAC rule 3745-21-15, have been used each operating day in the semiannual reporting period, or should otherwise identify the periods of use of noncompliant coatings, the reasons for the use of noncompliant coatings, and the amounts and VOC contents of each noncompliant coating used. Additionally, the certification shall state that the viscosity of the finishing material in the reservoir has not been less than the viscosity of the initial finishing material, that is, the material that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.
 - iii. For wood furniture manufacturing operations subject to the work practice requirements of paragraph (F) of OAC rule 3745-21-15, the compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented.
 - iv. The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification.
 - v. The compliance certification shall be signed by a responsible official of the company that owns or operates the wood furniture manufacturing operations.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

Volatile organic compounds (VOC) emissions from coatings shall not exceed the following:

- i. Emissions unit R003, 5.0 pounds per day and 0.9 ton per year;
- ii. Emissions unit R009, 2.4 pounds per day and 0.4 ton per year; and
- iii. Emissions unit R001, 83.5 pounds per day and 15.2 ton per year..

Applicable Compliance Methods:

Compliance with the daily limitation shall be demonstrated through the record keeping requirements specified in d)(1)d. Compliance with the annual limitation shall be demonstrated by summing the daily emissions for each emissions unit.

b. Emission Limitations:

VOC emissions from the use of facility-wide cleanup, touchup and support materials shall not exceed 1367 pounds per month and 7.9 tons per year.

Applicable Compliance Methods:

Compliance with the monthly limitation shall be demonstrated through the record keeping requirements specified in d)(2)d. Compliance with the annual limitation shall be demonstrated by summing the facility-wide monthly emissions.

c. Emission Limitations:

Facility-wide emissions of any individual HAP shall not exceed 4.4 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in d)(3)f.

d. Emission Limitation:

Facility-wide emissions of total combined HAPs shall not exceed 11.5 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in d)(3)h.

e. Emission Limitation:

The VOC content of any topcoat shall not exceed 0.8 pound of VOC per pound of solids, as applied.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in d)(4) and d)(5).

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Spray Coaters: R004, R005, and R007

EU ID	Operations, Property and/or Equipment Description
R004	UV toner moulding finish line spray coater
R005	UV moulding finish line spray coater
R007	UV moulding topcoat spray coater

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d and d)(6)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)b, d)(3), e)(1), f)(1)c and f)(1)d

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI No. 02-13185	VOC emissions from the use of facility-wide cleanup, touchup and support materials shall not exceed 1367 pounds per month and 7.9 tons per year. See b)(2)a.
b.	OAC rule 3745-31-05(D)(1)	Facility-wide emissions of any individual hazardous air pollutant (HAP) shall not exceed 4.4 tons per rolling, 12-month period. Facility-wide emissions of total combined HAPs shall not exceed 11.5 tons per rolling, 12-month period.

c.	OAC rule 3745-21-15	See b)(2)b, b)(2)c, b)(2)d, d)(4), d)(5), and e)(2).
d.	OAC rule 3745-114-01	See d)(6).
e.	OAC rule 3745-17-11 (C)	See c)(1), c)(2), d)(7) d)(8), d)(9), d)(10), and d)(11).
f.	40 CFR Part63, Subpart JJ – National Emissions Standards for Hazardous Air Pollutant Emissions from Wood Furniture Manufacturing Operations	See b)(2)e.

(2) Additional Terms and Conditions

- a. Volatile organic compounds (VOC) emissions from coatings shall not exceed the following:
 - i. Emissions unit R004, 74.8 pounds per day and 13.5 ton per year;
 - ii. Emissions unit R005, 13.0 pounds per day and 2.3 ton per year; and
 - iii. Emissions unit R007, 52.5 pounds per day and 9.5 ton per year.
- b. The permittee shall comply with the following limitations:
 - i. the VOC content of any topcoat shall not exceed 0.8 pound of VOC per pound of solids, as applied.
 - ii. there is no VOC content limit for sealers, stains, basecoats, and washcoats in accordance with OAC rule 3745-21-15(D)(1)(b).
- c. The permittee shall prepare and maintain a written work practice implementation plan. The plan shall define environmentally desirable work practices for each wood furniture manufacturing operation and address each of the work practices contained in paragraphs (b) to (d) and (f) to (k) of 40 CFR 63.803.
- d. This rule shall become federally enforceable on the date the U.S. EPA approves this rule as a revision to the Ohio SIP for ozone.
- e. This facility is not an affected source subject to the requirements of 40 CFR Part 63, Subpart JJ, because it is a major source, as defined in 40 CFR §63.2, for individual or total combined HAPs. The permittee shall not exceed the HAP emission limitations contained in this permit without first obtaining a permit modification.

c) Operational Restrictions

- (1) The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry

particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

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

d) **Monitoring and/or Recordkeeping Requirements**

- (1) In order to determine daily VOC emissions, the permittee shall collect and record the following information each day for each emissions unit:
 - a. the company identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating employed, in pounds per gallon; and
 - d. the total VOC emission rate for all coatings employed each day, calculated as the sum of "b x c" for each coating employed.
- (2) In order to determine monthly facility-wide VOC emissions from the use of cleanup, touchup, and support materials, the permittee shall collect and record the following facility-wide information each month:
 - a. the company identification of each such material employed;
 - b. the number of gallons of each such material employed;
 - c. the VOC content of each such material employed, in pounds per gallon; and
 - d. the total VOC emission rate from the use of all such materials, calculated as the sum of "b x c" for each such material, in pounds per month.
- (3) In order to determine the rolling, 12-month emissions of HAP, the permittee shall collect and record the following facility-wide information each month:
 - a. the company identification for each coating, cleanup, touchup and support material employed;
 - b. the individual HAP content for each such material in pounds of individual HAP per gallon material employed, as applied;
 - c. the total combined HAPs content for each such material employed, as applied;
 - d. the number of gallons of each such material employed;
 - e. the monthly emissions of each individual HAP, calculated as the sum of "b x d" for each such material employed;

- f. the rolling, 12-month summation of each individual HAP emissions facility-wide, in tons;
 - g. the monthly emissions of total combined HAPs, calculated as the sum of “c x d” for each such material employed; and
 - h. the rolling, 12-month summation of total combined HAPs emissions facility-wide, in tons.
- (4) The permittee shall employ the following procedures for determining the VOC content and solids content of a coating.
- a. The as-applied VOC content of a finishing material that is applied by a continuous coater shall be determined by the VOC content of the finishing material in the reservoir and the VOC content as calculated from records.
 - b. The VOC content and solids content of a coating shall be determined in accordance with paragraph (B) of OAC rule 3745-21-10 wherein formulation data or USEPA Method 24 procedures (which include various ASTM measurement methods) may be employed.
 - c. A certified product data sheet that provides data on VOC content and solids content shall be used by the permittee provided that any data based upon a measurement method shall be a measurement method that meets paragraph (I) of OAC rule 3745-21-15.
- (5) All records required under OAC rule 3745-21-15(K) shall be retained for a period of not less than five years and shall be made available to the Director or any authorized representative of the director for review during normal business hours. The following types of records are to be maintained.
- a. Compliance demonstration records for finishing operations:
 - i. a record of the VOC emission requirement elected to be met under any one paragraph of paragraphs (D)(1) to (D)(5) of OAC rule 3745-21-15 for each day of operation of the finishing operation;
 - ii. a certified product data sheet for each finishing material that is subject to a VOC emission requirement elected to be met under paragraph (K)(2)(a) of OAC rule 3745-21-15, and a certified product data sheet for any thinners or other VOC material added to the finishing materials before application; and
 - b. a record of the VOC content, in pounds of VOC per pound of solids, as applied, of each finishing material, other than a stain, that is subject to a VOC content limit or a daily VOC emissions limit under paragraph (D) of OAC rule 3745-21-15, including documentation on any thinner or other VOC added to the finishing material before application. Work practice implementation plan records:

- i. records demonstrating that the operator training program required by 40 CFR 63.803(b) is in place;
 - ii. records collected in accordance with the inspection and maintenance plan required by 40 CFR 63.803(c);
 - iii. records associated with the cleaning solvent accounting system required by 40 CFR 63.803(d);
 - iv. records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semi-annual period as required by 40 CFR 63.803(h); and
 - v. copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- (6) Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified FEPTIO prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.
- (7) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.
- (8) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (9) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (10) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

- a. the date of the inspection;
- b. a description of each/any problem identified and the date it was corrected;
- c. a description of any maintenance and repairs performed; and
- d. the name of person who performed the inspection.

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

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

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation reports that identify :
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. any month in which the facility-wide emissions of any individual HAP exceeded 4.4 tons per rolling, 12-month period and the actual facility-wide emissions of any such HAP in each such month; and
 - ii. any month in which the facility-wide emissions of total combined HAPs exceeded 11.5 tons per rolling, 12-month period and the actual facility-wide emissions of total combined HAPs in each such month.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

- (2) The permittee shall submit semiannual compliance status reports concerning the requirements specified in OAC rule 3745-21-15 no later than thirty calendar days after the end of each six-month period to the Ohio EPA Northeast District Office. Reports shall be submitted no later than thirty calendar days after the end of each six-month period following the first report. For each semiannual compliance status report, the permittee shall submit the following information for the six-month period covered by the report:
- a. For any finishing operation subject to paragraph (D) of OAC rule 3745-21-15, any changes to the previous reporting of which paragraph of paragraphs (D)(1) to (D)(5) of OAC rule 3745-21-15 is elected to be met.
 - b. For any topcoat or sealer that is applied by means of a continuous coater, any changes to the means of compliance previously reported. If the change pertains to the use of the procedures of paragraph (I)(5)(b) of OAC rule 3745-21-15 for the VOC content and viscosity measurements of a continuous coater, data that demonstrates the correlation between the viscosity of the finishing material and the VOC content of the finishing material in the reservoir.
 - c. Compliance certification for semiannual reporting period including the following compliance certifications, where applicable:
 - i. For any topcoat or sealer that is subject to the VOC content limit of paragraph (D)(1), (D)(2), (D)(4)(b), or (D)(5)(b) of OAC rule 3745-21-15 and that complies by the procedures of paragraphs (I)(1) to (I)(4) of OAC rule 3745-21-15, the compliance certification shall state that compliant coatings for topcoats and sealers, as applicable, have been used each operating day in the semiannual reporting period, or should otherwise identify the periods of use of noncompliant coatings for topcoats and sealers, as applicable, the reasons for the use of noncompliant coatings, and the amounts and VOC contents of each noncompliant coating used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.
 - ii. For any topcoat or sealer that is applied by means of a continuous coater, that is subject to the VOC content limit of paragraph (D)(1), (D)(2), (D)(4)(b), or (D)(5)(b) of OAC rule 3745-21-15, and that complies by the procedures of paragraph (I)(5) of OAC rule 3745-21-15, the compliance certification shall state the following, whichever is applicable:
 - (a) The compliance certification shall state that compliant coatings, as determined by the procedures of paragraph (I)(5)(a) of OAC rule 3745-21-15, have been used each operating day in the semiannual reporting period, or should otherwise identify the periods of use of noncompliant coatings, the reasons for the use of noncompliant coatings, and the amounts and VOC contents of each noncompliant coating used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used

- (b) The compliance certification shall state that compliant coatings, as determined by the procedures of paragraph (I)(5)(b) of OAC rule 3745-21-15, have been used each operating day in the semiannual reporting period, or should otherwise identify the periods of use of noncompliant coatings, the reasons for the use of noncompliant coatings, and the amounts and VOC contents of each noncompliant coating used. Additionally, the certification shall state that the viscosity of the finishing material in the reservoir has not been less than the viscosity of the initial finishing material, that is, the material that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used.
 - iii. For wood furniture manufacturing operations subject to the work practice requirements of paragraph (F) of OAC rule 3745-21-15, the compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented.
 - iv. The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification.
 - v. The compliance certification shall be signed by a responsible official of the company that owns or operates the wood furniture manufacturing operations.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.
- f) **Testing Requirements**
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitations:

Volatile organic compounds (VOC) emissions from coatings shall not exceed the following:

 - i. Emissions unit R004, 74.8 pounds per day and 13.5 ton per year;
 - ii. Emissions unit R005, 13.0 pounds per day and 2.3 ton per year; and

iii. Emissions unit R007, 52.5 pounds per day and 9.5 ton per year.

Applicable Compliance Methods:

Compliance with the daily limitation shall be demonstrated through the record keeping requirements specified in d)(1)d. Compliance with the annual limitation shall be demonstrated by summing the daily emissions for each emissions unit.

b. Emission Limitations:

VOC emissions from the use of facility-wide cleanup, touchup and support materials shall not exceed 1367 pounds per month and 7.9 tons per year.

Applicable Compliance Methods:

Compliance with the monthly limitation shall be demonstrated through the record keeping requirements specified in d)(2)d. Compliance with the annual limitation shall be demonstrated by summing the facility-wide monthly emissions.

c. Emission Limitation:

Facility-wide emissions of any individual HAP shall not exceed 4.4 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in d)(3)f.

d. Emission Limitation:

Facility-wide emissions of total combined HAPs shall not exceed 11.5 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in d)(3)h.

e. Emission Limitation:

The VOC content of any topcoat shall not exceed 0.8 pound of VOC per pound of solids, as applied.

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements specified in d)(4) and d)(5).

- g) Miscellaneous Requirements
 - (1) None.