

Synthetic Minor Determination and/or Netting Determination

Permit To Install: 02-22946

A. Source Description

L&J Woodworking manufactures and finishes wood millwork. This PTI is a Chapter 31 modification of three wood coating operations originally permitted in 2005 and the installation of an additional wood coating operation.

B. Facility Emissions and Attainment Status

The facility is located in Wayne County, which is attainment for all criteria pollutants. The facility emits VOC from four permitted wood part finishing spray booths, and two stationary diesel engines. The facility-wide Potentials to Emit are 357.1 tons of VOC emissions, 9.1 tons of single HAP and 24.4 tons of combined HAPs.

C. Source Emissions

R001 - Wood millwork coating operation equipped with dry overspray filters and one air-assisted spray gun/pump previously permitted under synthetic minor PTI 02-20418 (6/21/05). Pieces are manually moved and air dried. The facility uses both photochemically reactive and non-photochemically reactive coatings at this time. Days when a PRM is employed, the unit is subject to OAC rule 3745-21-07(G)(2).

R002 - Wood millwork coating operation equipped with dry overspray filters and one air-assisted spray gun/pump previously permitted under synthetic minor PTI 02-20418 (6/21/05). Pieces are manually moved and air dried. The facility uses both photochemically reactive and non-photochemically reactive coatings at this time. Days when a PRM is employed, the unit is subject to OAC rule 3745-21-07(G)(2).

R003 - Wood millwork coating operation equipped with dry overspray filters and one air-assisted spray gun/pump previously permitted under synthetic minor PTI 02-20418 (6/21/05). Pieces are manually moved and air dried. The facility uses both photochemically reactive and non-photochemically reactive coatings at this time. Days when a PRM is employed, the unit is subject to OAC rule 3745-21-07(G)(2).

R004 - Wood millwork coating operation equipped with dry overspray filters and one air-assisted spray gun/pump previously permitted under synthetic minor PTI 02-20418 (6/21/05). Pieces are manually moved and air dried. The facility uses both photochemically reactive and non-photochemically reactive coatings at this time. Days when a PRM is employed, the unit is subject to OAC rule 3745-21-07(G)(2).

Two stationary diesel engines (B001 and P003) are included in the calculations below.

The potential to emit for this facility:

EU	VOC (TPY)	combined HAP (TPY)	single HAP (TPY)
R001	89.03		
R002	62.23		
R003	113.83		
R004	89.03		
exempt boilers	2.98		
Total	357.1	24.38	9.11

The allowable emissions including the federally enforceable limits in this PTI limit the PTE to:

EU	VOC (TPY)	combined HAP (TPY)	single HAP (TPY)
R001, R002, R003 and R004 combined	79.9	5.46	2.04
stationary engines	2.98	0	0
Total	82.88	5.46	2.04

D. Conclusion

The federally enforceable limits for the coating VOC emissions, as a rolling, 12-month summation, and the

associated record keeping and reporting in this PTI is sufficient to reduce the facility's PTE for VOC below the Title V.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
WAYNE COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 02-22946

Fac ID: 0285000420

DATE: 5/29/2008

L and J Woodworking, Ltd.
Ray Yoder
9035 Senff Rd
Dundee, OH 44624

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1200** will be due. Please do not submit any payment now.

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

Sincerely,

Michael W. Ahern

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

CC: USEPA

NEDO

WAYNE COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **02-22946** FOR AN AIR CONTAMINANT SOURCE
FOR **L and J Woodworking, Ltd.**

On 5/29/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **L and J Woodworking, Ltd.**, located at **9035 Senff Rd., Dundee, Ohio.**

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 02-22946:

Chapter 31 modification to increase coating application rates and to add a new spray booth.

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

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



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 02-22946

Application Number: 02-22946
Facility ID: 0285000420
Permit Fee: **To be entered upon final issuance**
Name of Facility: L and J Woodworking, Ltd.
Person to Contact: Ray Yoder
Address: 9035 Senff Rd
Dundee, OH 44624

Location of proposed air contaminant source(s) [emissions unit(s)]:

**9035 Senff Rd.
Dundee, Ohio**

Description of proposed emissions unit(s):

Chapter 31 modification to increase coating application rates and to add a new spray booth.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

L and J Woodworking, Ltd.

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Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0285000420

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	79.9 TPY (11.1 TPY decrease)

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (R001) - wood part coating operation in a booth with dry overspray filters, one air-assisted spray pump/gun. Parts manually moved and air dried.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.b, A.2.d, A.2.e and B.3 through B.12 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-17-11(C).
OAC rule 3745-21-07(G)(2)	See section A.2.a below.
OAC rule 3745-31-05(C)	See sections A.2.c and B.1 below.
OAC rule 3745-17-11(C)	See sections B.2 below.

2. Additional Terms and Conditions

- 2.a Each day that a photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and from photochemically reactive materials shall not exceed 8 pounds per hour and 40 pounds per day. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in sections C.4, D.2.a, E.1.a and E.1.b shall be void.

- 2.b Each day that photochemically reactive materials [as defined in OAC rule 3745-21-01(C)(5)] are not employed, the volatile organic compound (VOC)

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emissions from coatings and cleanup materials shall not exceed 20.25 pounds per hour, as a daily average. This limit is based upon the maximum application rate of 3.0 gallons per hour.

The requirement to comply with this emissions limitation only on days photochemically reactive coating or clean up material are employed shall cease on the date the U.S. EPA approves revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, this emissions limitation shall be effective every day the emissions unit is in operation.

- 2.c The VOC emissions from all VOC-containing material employed in this emissions unit and in emissions units R001, R002, R003 and R004, combined, shall not exceed 79.9 tons per rolling, 12-month period.
- 2.d The VOC content of each coating shall not exceed 6.75 pounds per gallon, as applied.
- 2.e The VOC content of the strippable spray booth materials shall not exceed 0.8 pound per pound of solids, as applied.

B. Operational Restrictions

1. The maximum coating usage for this emissions unit and emissions unit R001, R002, R003 and R004, combined, shall not cause emissions to exceed 79.9 tons of VOC per rolling, 12 months, calculated using the following formula:

$$79.9 \text{ tons VOC} \geq \sum_{n=1}^i \frac{(P_i)(VOC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of coating i in gallons; and
 VOC_i = VOC content of coating i in pounds VOC per gallon.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC coating usage, upon issuance of this permit.

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2. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.

The permittee shall operate and maintain the dry filtration system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee; and all such documentation from the manufacturer and the record of any modifications determined necessary by the permittee or operator shall be maintained as a facility record and shall be made available to the Ohio EPA upon request.

3. The permittee shall prepare and maintain written work practices that define environmentally desirable work practices for each wood furniture manufacturing operation and address each of the work practices in sections C.4 through C.12.
4. The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the issuance of this permit, shall be trained upon hiring. All existing personnel, those hired before the issuance of this permit, shall be trained within six months of the issuance of this permit. All personnel shall be given refresher training annually.

The permittee shall develop the plan within 60 days after issuance of this permit and shall maintain a copy of the training program with the work practice implementation plan on site. The training program shall include, at a minimum, the following:

- a. a list of all current personnel by name and job description that are required to be trained;
 - b. an outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
 - c. lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - d. a description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
5. The permittee source shall prepare and maintain with the work practice implementation plan, a written leak inspection, and maintenance plan that specifies:

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- a. a minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or VOC solvents;
 - b. an inspection schedule;
 - c. methods for documenting the date and results of each inspection and any repairs that were made; and
 - d. the timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - i. a first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - ii. final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within 3 months.
6. The permittee shall develop a VOC solvent accounting form to record:
- a. the quantity and type of VOC solvent used each month for washoff and cleaning, as defined in § 63.801 of 40 CFR Part 63, Subpart JJ;
 - b. the number of pieces washed off, and the reason for the washoff; and
 - c. the quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled on site or disposed off site.
7. The permittee shall not use compounds containing more than 8.0 percent, by weight, of VOC to clean spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished.
8. The permittee shall use no more than 1.0 gallon of VOC solvent per booth to prepare the surface of the booth prior to applying the booth coating, if the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced.
9. The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.

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10. The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
 - a. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - b. For touchup and repair under the following conditions:
 - i. The touchup and repair occurs after completion of the finishing operation; or
 - ii. The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - c. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
 - d. The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic infeasibility by submitting to the Director a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:
 - i. The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - ii. The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
11. The permittee shall pump or drain all VOC solvent used for line cleaning into a normally closed container.
12. The permittee shall collect all VOC solvent used to clean spray guns into a normally closed container.

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C. Monitoring and/or Record Keeping 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 daily:
 - a. the company identification for each cleanup material employed; and
 - b. the VOC content of each material, in percent by weight.
3. The permittee shall collect and record the following information and day the spray booth is being refurbished:
 - a. the company identification for each cleanup material employed;
 - b. the number of gallons of each cleanup material employed, (gallons dispensed minus gallons recovered for proper disposal);
 - c. the VOC content of each cleanup material, in pounds VOC per gallon; and
 - d. the total VOC emissions, in lbs/day.
4. The permittee shall collect and record the following information for each day that photochemically reactive coatings, washoff or cleanup material are employed in this emissions unit:
 - a. the company identification for each coating, washoff and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating, washoff and photochemically reactive cleanup material employed;
 - c. the OC content of each coating, washoff and photochemically reactive cleanup material, in pounds OC per gallon;
 - d. the total emissions rate for all coatings, washoff and photochemically reactive cleanup materials, in pounds OC per day;
 - e. the total number of hours the emissions unit was in operation;

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- f. the average hourly OC emission rate for all coatings, washoff and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);
- g. the VOC content of each coating, washoff and photochemically reactive cleanup material, in pounds VOC per gallon; and
- h. the total emissions rate for all coatings, washoff and photochemically reactive cleanup materials, in pounds VOC per day.

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

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, section C.4 will be voided entirely.]

5. The permittee shall collect and record the following information for each day that photochemically reactive coatings, washoff or cleanup materials are not employed in this emissions unit:
 - a. the company identification for each coating and washoff employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
 - c. the number of gallons of each coating washoff employed;
 - d. the VOC content of each coating and washoff, in lbs/gallon;
 - e. the total VOC emission rate for all coatings and washoff, in lbs/day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly VOC emission rate for all coatings and washoff, i.e., (d)/(e), in lbs/hr.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the records required by this section shall be kept on a daily basis with no reference to photochemically reactive materials.]

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6. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each cleanup material;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
 - c. the VOC content of each nonphotochemically cleanup material, in lbs/gallon;
 - d. the number of gallons of each cleanup material employed minus the number of gallons of cleanup material recovered for disposal; and
 - e. the total VOC emissions from all nonphotochemically cleanup materials employed, in tons per month, i.e., sum of (c) times (d).

[Note: Records of nonphotochemically reactive cleanup material shall be recorded monthly according to section C.6 above. After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding any reference to "nonphotochemically reactive". Section 6.b shall be void.]

7. The permittee shall collect and record the following information for each month for the emissions unit to demonstrate compliance with the synthetic minor operational restrictions:
 - a. the actual VOC emissions from all coatings and cleanup materials for the previous, 12-month period [i.e., sum of the daily VOC emissions (terms C.3.d + C.4.h + C.5.e + and the strippable spray booth material records in section C.8) and the monthly nonphotochemically reactive cleanup material VOC emission (term C.6.e) for the previous, 12-month period]; and
 - b. the actual VOC emissions from R001, R002, R003 and R004, combined, for the previous 12-month period.
8. The permittee shall maintain on site the work practice implementation plan requirements in sections B.3 through B.12 and all records associated with fulfilling the requirements of that plan, including, but not limited to the following:
 - a. records demonstrating that the operator training program required by section B.4 is in place;

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- b. records collected in accordance with the inspection and maintenance plan required by section B.5;
 - c. records associated with the cleaning solvent accounting system required by section B.6;
 - d. 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 semiannual period as required by section B.10; and
 - e. copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
9. The permit to install for these emissions units were evaluated based on the actual materials and the design parameters of the emissions unit's(s)' exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";
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- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: xylene

TLV (mg/m³): 434.2

Maximum Hourly Emission Rate (lbs/hr): 2.30

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1396

MAGLC (ug/m³): 10,338

The permittee, has demonstrated that emissions of xylene, from emissions units R001, R002, R003, R004, combined is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- 10. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

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- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

11. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour

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maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

- d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
12. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
 13. The permittee shall conduct periodic inspections of the dry filtration system to determine whether the system is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the dry filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer of the dry filtration system, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency.

In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair for the dry filtration system to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
 14. The permittee shall document each inspection (periodic and annual) of the dry filtration system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each 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.

15. In the event that the dry filtration system are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the

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dry filtration system is not operating in accordance with such requirements.

D. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were not in service or not operated in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee 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 submit quarterly deviation reports that identify:
 - a. for the days during which a photochemically reactive material was employed, each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such incident;
 - b. for the days during which a photochemically reactive material was not employed, each day during which the average VOC emissions from the coatings and cleanup materials exceeded the pounds per hour limitation, and the actual average VOC emissions for each such day;
 - c. each day during which the VOC content of any coating exceeded the pounds per gallon limitation and the actual VOC content of each such coatings employed; and
 - d. any exceedance of the annual VOC limitation, as a rolling, 12-month summation and the actual VOC emissions during such period.

*based upon the premise that 100% of the solvent in the coating and cleanup material employed is emitted.

The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding section D.2.a and the opening phrase of section D.2.b that references photochemically reactive material.]

3. The permittee shall submit semiannual compliance certifications that state:

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- a. compliant coatings for strippable spray booth materials have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant coatings for strippable spray booth materials were used, the reasons for the use of noncompliant coatings, and the amounts and VOC contents of each noncompliant coating used; and
- b. 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.

The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification. This report shall be postmarked or delivered no later than July 30 and January 30 following the end of each 6-month period to the Director (Ohio EPA, Northeast District Office).

4. The permittee shall also submit an annual report of the total annual VOC emissions. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year to the Director (Ohio EPA, Northeast District Office).
5. The permittee shall submit annual reports to Ohio EPA Northeast District Office, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

E. Testing Requirements

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

8 pounds per hour of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

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Compliance shall be demonstrated by the daily values calculated in section C.4.f based upon the record keeping requirements specified in section C.4.

b. Emission Limitation:

40 pounds per day of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in section C.4.d based upon the record keeping requirements specified in section C.4.

c. Emission Limitation:

20.25 pounds VOC emissions per hour for each day that photochemically reactive materials are not employed.

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in section C.5.f based on the record keeping requirements specified in section C.5.

d. Emission Limitation:

79.9 tons of VOC emissions per rolling, 12-month period from all coatings, washoff, strippable spray booth material and cleanup material from R001, R002, R003 and R004, combined

Applicable Compliance Method:

Compliance shall be demonstrated by the value recorded in section C.7 based on the record keeping requirements specified in sections C.3, C.4, C.5, C.6 and C.8.

e. Emission Limitations:

6.75 pounds of VOC per gallon coating
8.0% by weight VOC for cleanup material
0.8 pound VOC per pound of solids, as applied for strippable spray booth material

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Applicable Compliance Method:

Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-15(I)(4), the permittee shall determine the composition of the coatings by using a certified product data sheet that provides data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding sections E.1.a and E.1.b, by voiding the reference to photochemically reactive materials in section E.1.c and by voiding the reference to section C.4 in section E.1.d.]

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05, the following terms and condition of this permit to install are federally enforceable: A through F, except C.9, C.10, C.11, C.12 and D.5.
2. The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 02-20418 issued on June 21, 2005.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

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Operations, Property, and/or Equipment - (R002) - wood part coating in a booth with dry overspray filters and one air-assisted spray pump/gun. Parts are manually moved and air dried.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.b, A.2.d and B.3 through B.12 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-17-11(C).
OAC rule 3745-21-07(G)(2)	See section A.2.a below.
OAC rule 3745-31-05(C)	See sections A.2.c and B.1 below.
OAC rule 3745-17-11(C)	See sections B.2 below.

2. Additional Terms and Conditions

- 2.a** Each day that a photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and from photochemically reactive materials shall not exceed 8 pounds per hour and 40 pounds per day. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in sections C.5, D.2.a, E.1.a and E.1.b shall be void.

- 2.b** Each day that photochemically reactive materials [as defined in OAC rule 3745-21-01(C)(5)] are not employed, the volatile organic compound (VOC) emissions from coatings and cleanup materials shall not exceed 14.13 pounds per hour, as a daily average. This limit is based upon the maximum application rate of 3.0 gallons per hour. The VOC content of each sealer and topcoat shall not exceed 4.71 pounds per gallon, as applied.

The requirement to comply with this emissions limitation only on days photochemically reactive coating or clean up material are employed shall cease on the date the U.S. EPA approves revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the

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Ohio SIP, this emissions limitation shall be effective every day the emissions unit is in operation.

- 2.c** The VOC emissions from all VOC-containing material employed in this emissions unit and in emissions units R001, R002, R003 and R004, combined, shall not exceed 79.9 tons per rolling, 12-month period.
- 2.d** The VOC content of topcoats, sealers and strippable spray booth materials shall not exceed:
- i. 1.8 pounds of VOC per pound of solids, as applied, for any topcoat except for acid-cured alkyd amino conversion varnish topcoats;
 - ii. 2.0 pounds of VOC per pound of solids, as applied, for any acid-cured alkyd amino conversion varnish topcoat;
 - iii. 1.9 pounds of VOC per pound of solids, as applied, for any sealer, except for acid-cured alkyd amino sealers;
 - iv. 2.3 pounds of VOC per pound of solids, as applied, for any acid-cured alkyd amino sealer; and
 - v. 0.8 pound of VOC per pound of solids, as applied, for any strippable spray booth material.

B. Operational Restrictions

1. The maximum coating usage for this emissions unit and emissions unit R001, R002, R003 and R004, combined, shall not cause emissions to exceed 79.9 tons of VOC per rolling, 12 months, calculated using the following formula:

$$79.9 \text{ tons VOC} \geq \sum_{n=1}^i \frac{(P_i)(VOC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of coating i in gallons; and
 VOC_i = VOC content of coating i in pounds VOC per gallon.

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This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC coating usage, upon issuance of this permit.

2. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.

The permittee shall operate and maintain the dry filtration system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee; and all such documentation from the manufacturer and the record of any modifications determined necessary by the permittee or operator shall be maintained as a facility record and shall be made available to the Ohio EPA upon request.

3. The permittee shall prepare and maintain written work practices that define environmentally desirable work practices for each wood furniture manufacturing operation and address each of the work practices in sections C.4 through C.12.
4. The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the issuance of this permit, shall be trained upon hiring. All existing personnel, those hired before the issuance of this permit, shall be trained within six months of the issuance of this permit. All personnel shall be given refresher training annually.

The permittee shall develop the plan within 60 days after issuance of this permit and shall maintain a copy of the training program with the work practice implementation plan on site. The training program shall include, at a minimum, the following:

- a. a list of all current personnel by name and job description that are required to be trained;
- b. an outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
- c. lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate

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- management of cleanup wastes; and
- d. a description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
5. The permittee source shall prepare and maintain with the work practice implementation plan, a written leak inspection, and maintenance plan that specifies:
 - a. a minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or VOC solvents;
 - b. an inspection schedule;
 - c. methods for documenting the date and results of each inspection and any repairs that were made; and
 - d. the time frame between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - i. a first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - ii. final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within 3 months.
 6. The permittee shall develop a VOC solvent accounting form to record:
 - a. the quantity and type of VOC solvent used each month for washoff and cleaning, as defined in § 63.801 of 40 CFR Part 63, Subpart JJ;
 - b. the number of pieces washed off, and the reason for the washoff; and
 - c. the quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled on site or disposed off site.
 7. The permittee shall not use compounds containing more than 8.0 percent, by weight, of VOC to clean spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished.
 8. The permittee shall use no more than 1.0 gallon of VOC solvent per booth to prepare the surface of the booth prior to applying the booth coating, if the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover

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the booth is being replaced.

9. The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
10. The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
 - a. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - b. For touchup and repair under the following conditions:
 - i. The touchup and repair occurs after completion of the finishing operation; or
 - ii. The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - c. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
 - d. The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic infeasibility by submitting to the Director a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:
 - i. The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - ii. The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

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11. The permittee shall pump or drain all VOC solvent used for line cleaning into a normally closed container.
12. The permittee shall collect all VOC solvent used to clean spray guns into a normally closed container.

C. Monitoring and/or Record Keeping 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 daily:
 - a. the company identification for each sealer, topcoat and strippable spray booth material employed;
 - b. the type of material, (i.e., acid-cured alkyd amino sealer); and
 - c. the VOC content of each material, as applied, in pounds VOC per pound of solids.

The as applied formulation of the material shall include any thinner, catalyst or other material added prior to application.

3. The permittee shall collect and record the following information daily:
 - a. the company identification for each cleanup material employed; and
 - b. the VOC content of each material, in percent by weight.
4. The permittee shall collect and record the following information and day the spray booth is being refurbished:
 - a. the company identification for each cleanup material employed;
 - b. the number of gallons of each cleanup material employed, (gallons dispensed minus gallons recovered for proper disposal);
 - c. the VOC content of each cleanup material, in pounds VOC per gallon; and
 - d. the total VOC emissions, in lbs/day.
5. The permittee shall collect and record the following information for each day that

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photochemically reactive coatings, washoff or cleanup material are employed in this emissions unit:

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

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

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, section C.5 will be voided entirely.]

6. The permittee shall collect and record the following information for each day that photochemically reactive coatings, washoff or cleanup materials are not employed in this emissions unit:
 - a. the company identification for each coating and washoff employed;

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- b. documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
- c. the number of gallons of each coating washoff employed;
- d. the VOC content of each coating and washoff, in lbs/gallon;
- e. the total VOC emission rate for all coatings and washoff, in lbs/day;
- f. the total number of hours the emissions unit was in operation; and
- g. the average hourly VOC emission rate for all coatings and washoff, i.e., (e)/(f), in lbs/hr.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the records required by this section shall be kept on a daily basis with no reference to photochemically reactive materials.]

7. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each cleanup material and strippable spray booth materials;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
 - c. the VOC content of each nonphotochemically cleanup material and strippable spray booth materials, in lbs/gallon;
 - d. the number of gallons of each material employed minus the number of gallons of cleanup material recovered for disposal; and
 - e. the total VOC emissions from all nonphotochemically cleanup materials and strippable spray booth materials employed, in tons per month, i.e., sum of (c) times (d).

[Note: Records of nonphotochemically reactive cleanup material shall be recorded monthly according to section C.7 above. After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding any reference to "nonphotochemically reactive" and voiding the reference to section C.7.b.]

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8. The permittee shall collect and record the following information for each month for the emissions unit to demonstrate compliance with the synthetic minor operational restrictions:
 - a. the actual VOC emissions from all coatings and cleanup materials for the previous, 12-month period [i.e., sum of the daily VOC emissions (terms C.4.d + C.5.h + C.6.e + and the strippable spray booth material records in section C.9) and the monthly nonphotochemically reactive cleanup material VOC emission (term C.7.e) for the previous, 12-month period]; and
 - b. the actual VOC emissions from R001, R002, R003 and R004, combined, for the previous 12-month period.

9. The permittee shall maintain on site the work practice implementation plan requirements in sections B.3 through B.12 and all records associated with fulfilling the requirements of that plan, including, but not limited to the following:
 - a. records demonstrating that the operator training program required by section B.4 is in place;
 - b. records collected in accordance with the inspection and maintenance plan required by section B.5;
 - c. records associated with the cleaning solvent accounting system required by section B.6;
 - d. 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 semiannual period as required by section B.10; and
 - e. copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.

10. The permit to install for these emissions units were evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at

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over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";
or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: xylene

TLV (mg/m³): 434.2

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Maximum Hourly Emission Rate (lbs/hr): 2.30

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1396

MAGLC (ug/m3): 10,338

The permittee, has demonstrated that emissions of xylene, from emissions units R001, R002, R003, R004, combined is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

11. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
 - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification" or if a new toxic is emitted, or the modeled toxic(s) is/are expected to exceed the previous modeled level(s), then the permittee shall apply for and obtain a final permit-to-install prior to the change. The Director may consider any

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significant departure from the operations of the emissions unit, described in the permit-to-install application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and may require the permittee to submit a permit-to-install application for the increased emissions.

12. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
13. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
14. The permittee shall conduct periodic inspections of the dry filtration system to determine whether the system is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the dry filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer of the dry filtration system, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency.

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In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair for the dry filtration system to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

15. The permittee shall document each inspection (periodic and annual) of the dry filtration system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each 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.

16. In the event that the dry filtration system are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the dry filtration system is not operating in accordance with such requirements.

D. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were not in service or not operated in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee 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 submit quarterly deviation reports that identify:
 - a. for the days during which a photochemically reactive material was employed, each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such incident;

 - b. for the days during which a photochemically reactive material was not employed, each day during which the average VOC emissions from the

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coatings and cleanup materials exceeded the pounds per hour limitation, and the actual average VOC emissions for each such day;

- c. each day during which the VOC content of any coating exceeded the pounds per gallon limitation and the actual VOC content of each such coatings employed; and
- d. any exceedance of the annual VOC limitation, as a rolling, 12-month summation and the actual VOC emissions during such period.

*based upon the premise that 100% of the solvent in the coating and cleanup material employed is emitted.

The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding section D.2.a and the opening phrase of section D.2.b that references photochemically reactive material.]

3. The permittee shall submit semiannual compliance certifications that state:
 - a. 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;
 - b. compliant coatings for strippable spray booth materials have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant coatings for strippable spray booth materials were used., the reasons for the use of noncompliant coatings, and the amounts and VOC contents of each noncompliant coating used; and
 - c. 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.

The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification. This report shall be postmarked or delivered no later than July 30 and January 30 following the end of each 6-month period to the Director (Ohio EPA,

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Northeast District Office).

4. The permittee shall also submit an annual report of the total annual VOC emissions. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year to the Director (Ohio EPA, Northeast District Office).
5. The permittee shall submit annual reports to Ohio EPA Northeast District Office, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

E. Testing Requirements

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

8 pounds per hour of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in section C.5.f based upon the record keeping requirements specified in section C.5.
 - b. Emission Limitation:

40 pounds per day of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in section C.5.d based upon the record keeping requirements specified in section C.5.
 - c. Emission Limitation:

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14.13 pounds VOC emissions per hour for each day that photochemically reactive materials are not employed.

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in section C.6.g based on the record keeping requirements specified in section C.6.

d. Emission Limitation:

79.9 tons of VOC emissions per rolling, 12-month period from all coatings, washoff, strippable spray booth material and cleanup material from R001, R002, R003 and R004, combined

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Applicable Compliance Method:

Compliance shall be demonstrated by the value recorded in section C.8 based on the record keeping requirements specified in sections C.4, C.5, C.6, C.7 and C.9.

e. Emission Limitations:

4.71 pounds of VOC per gallon, as applied for any topcoat and sealer

1.8 pounds of VOC per pound of solids, as applied, for any topcoat except for acid-cured alkyd amino conversion varnish topcoats

2.0 pounds of VOC per pound of solids, as applied, for any acid-cured alkyd amino conversion varnish topcoat

1.9 pounds of VOC per pound of solids, as applied, for any sealer, except for acid-cured alkyd amino sealers

2.3 pounds of VOC per pound of solids, as applied, for any acid-cured alkyd amino sealer

0.8 pound of VOC per pound of solids, as applied, for any strippable spray booth material

Applicable Compliance Method:

Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-15(I)(4), the permittee shall determine the composition of the coatings by using a certified product data sheet that provides data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

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[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding sections E.1.a and E.1.b, by voiding the reference to photochemically reactive materials in section E.1.c and by voiding the reference to section C.5 in section E.1.d.]

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F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05, the following terms and condition of this permit to install are federally enforceable: A through F, except C.10, C.11, C.12, C.13 and D.5.
2. The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 02-20418 issued on June 21, 2005.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (R003) - wood part coating in a booth with dry overspray filters and one air-assisted spray pump/gun. Parts are manually moved and air dried.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.b, A.2.d and B.3 through B.12 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-17-11(C).
OAC rule 3745-21-07(G)(2)	See section A.2.a below.
OAC rule 3745-31-05(C)	See sections A.2.c and B.1 below.
OAC rule 3745-17-11(C)	See sections B.2, B.13, B.14 and B.15 below.

2. Additional Terms and Conditions

- 2.a Each day that a photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and from photochemically reactive materials shall not exceed 8 pounds per hour and 40 pounds per day. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in sections C.5, D.2.a, E.1.a and E.1.b shall be void.

- 2.b Each day that photochemically reactive materials [as defined in OAC rule

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3745-21-01(C)(5)] are not employed, the volatile organic compound (VOC) emissions from coatings and cleanup materials shall not exceed 25.91 pounds per hour, as a daily average. This limit is based upon the maximum application rate of 5.5 gallons per hour. The VOC content of each sealer and topcoat shall not exceed 4.71 pounds per gallon, as applied.

The requirement to comply with this emissions limitation only on days photochemically reactive coating or clean up material are employed shall cease on the date the U.S. EPA approves revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, this emissions limitation shall be effective every day the emissions unit is in operation.

- 2.c** The VOC emissions from all VOC-containing material employed in this emissions unit and in emissions units R001, R002, R003 and R004, combined, shall not exceed 79.9 tons per rolling, 12-month period.
- 2.d** The VOC content of topcoats, sealers and strippable spray booth materials shall not exceed:
 - i. 1.8 pounds of VOC per pound of solids, as applied, for any topcoat except for acid-cured alkyd amino conversion varnish topcoats;
 - ii. 2.0 pounds of VOC per pound of solids, as applied, for any acid-cured alkyd amino conversion varnish topcoat;
 - iii. 1.9 pounds of VOC per pound of solids, as applied, for any sealer, except for acid-cured alkyd amino sealers;
 - iv. 2.3 pounds of VOC per pound of solids, as applied, for any acid-cured alkyd amino sealer; and
 - v. 0.8 pound of VOC per pound of solids, as applied, for any strippable spray booth material.

B. Operational Restrictions

1. The maximum coating usage for this emissions unit and emissions unit R001, R002, R003 and R004, combined, shall not cause emissions to exceed 79.9 tons of VOC per rolling, 12 months, calculated using the following formula:

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$$79.9 \text{ tons VOC} \geq \sum_{n=1}^i \frac{(P_i)(\text{VOC}_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of coating i in gallons; and
 VOC_i = VOC content of coating i in pounds VOC per gallon.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC coating usage, upon issuance of this permit.

2. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.

The permittee shall operate and maintain the dry filtration system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee; and all such documentation from the manufacturer and the record of any modifications determined necessary by the permittee or operator shall be maintained as a facility record and shall be made available to the Ohio EPA upon request.

3. The permittee shall prepare and maintain written work practices that define environmentally desirable work practices for each wood furniture manufacturing operation and address each of the work practices in sections C.4 through C.12.
4. The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the issuance of this permit, shall be trained upon hiring. All existing personnel, those hired before the issuance of this permit, shall be trained within six months of the issuance of this permit. All personnel shall be given refresher training annually.

The permittee shall develop the plan within 60 days after issuance of this permit and shall maintain a copy of the training program with the work practice implementation plan on site. The training program shall include, at a minimum, the following:

- a. a list of all current personnel by name and job description that are required to be trained;

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- b. an outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
 - c. lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - d. a description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
5. The permittee source shall prepare and maintain with the work practice implementation plan, a written leak inspection, and maintenance plan that specifies:
- a. a minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or VOC solvents;
 - b. an inspection schedule;
 - c. methods for documenting the date and results of each inspection and any repairs that were made; and
 - d. the timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - i. a first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - ii. final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within 3 months.
6. The permittee shall develop a VOC solvent accounting form to record:
- a. the quantity and type of VOC solvent used each month for washoff and cleaning, as defined in § 63.801 of 40 CFR Part 63, Subpart JJ;
 - b. the number of pieces washed off, and the reason for the washoff; and

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- c. the quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled on site or disposed off site.
7. The permittee shall not use compounds containing more than 8.0 percent, by weight, of VOC to clean spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished.
8. The permittee shall use no more than 1.0 gallon of VOC solvent per booth to prepare the surface of the booth prior to applying the booth coating, if the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced.
9. The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
10. The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
 - a. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - b. For touchup and repair under the following conditions:
 - i. The touchup and repair occurs after completion of the finishing operation; or
 - ii. The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - c. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
 - d. The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic infeasibility by submitting to the Director a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:

- i. The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - ii. The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
11. The permittee shall pump or drain all VOC solvent used for line cleaning into a normally closed container.
12. The permittee shall collect all VOC solvent used to clean spray guns into a normally closed container.

C. Monitoring and/or Record Keeping 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 daily:
 - a. the company identification for each sealer, topcoat and strippable spray booth material employed;
 - b. the type of material, (i.e., acid-cured alkyd amino sealer); and
 - c. the VOC content of each material, as applied, in pounds VOC per pound of solids.

The as applied formulation of the material shall include any thinner, catalyst or other material added prior to application.

3. The permittee shall collect and record the following information daily:
 - a. the company identification for each cleanup material employed; and
 - b. the VOC content of each material, in percent by weight.
 4. The permittee shall collect and record the following information and day the spray booth is being refurbished:

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- a. the company identification for each cleanup material employed;
 - b. the number of gallons of each cleanup material employed, (gallons dispensed minus gallons recovered for proper disposal);
 - c. the VOC content of each cleanup material, in pounds VOC per gallon; and
 - d. the total VOC emissions, in lbs/day.
5. The permittee shall collect and record the following information for each day that photochemically reactive coatings, washoff or cleanup material are employed in this emissions unit:
- a. the company identification for each coating, washoff and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating, washoff and photochemically reactive cleanup material employed;
 - c. the OC content of each coating, washoff and photochemically reactive cleanup material, in pounds OC per gallon;
 - d. the total emissions rate for all coatings, washoff and photochemically reactive cleanup materials, in pounds OC per day;
 - e. the total number of hours the emissions unit was in operation;
 - f. the average hourly OC emission rate for all coatings, washoff and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);
 - g. the VOC content of each coating, washoff and photochemically reactive cleanup material, in pounds VOC per gallon; and
 - h. the total emissions rate for all coatings, washoff and photochemically reactive cleanup materials, in pounds VOC per day.

[Note: The coating and washoff information must be for the coatings or washoff as employed, including any thinning solvents added at the emissions unit. Also, the

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definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, section C.5 will be voided entirely.]

6. The permittee shall collect and record the following information for each day that photochemically reactive coatings, washoff or cleanup materials are not employed in this emissions unit:
 - a. the company identification for each coating and washoff employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
 - c. the number of gallons of each coating washoff employed;
 - d. the VOC content of each coating and washoff, in lbs/gallon;
 - e. the total VOC emission rate for all coatings and washoff, in lbs/day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly VOC emission rate for all coatings and washoff, i.e., (e)/(f), in lbs/hr.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the records required by this section shall be kept on a daily basis with no reference to photochemically reactive materials.]

7. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each cleanup material and strippable spray booth materials;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
 - c. the VOC content of each nonphotochemically cleanup material and strippable spray booth materials, in lbs/gallon;
 - d. the number of gallons of each material employed minus the number of gallons of cleanup material recovered for disposal; and

- e. the total VOC emissions from all nonphotochemically cleanup materials and strippable spray booth materials employed, in tons per month, i.e., sum of (c) times (d).

[Note: Records of nonphotochemically reactive cleanup material shall be recorded monthly according to section C.7 above. After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding any reference to "nonphotochemically reactive" and voiding the reference to section C.7.b.]

- 8. The permittee shall collect and record the following information for each month for the emissions unit to demonstrate compliance with the synthetic minor operational restrictions:
 - a. the actual VOC emissions from all coatings and cleanup materials for the previous, 12-month period [i.e., sum of the daily VOC emissions (terms C.4.d + C.5.h + C.6.e + and the strippable spray booth material records in section C.9) and the monthly nonphotochemically reactive cleanup material VOC emission (term C.7.e) for the previous, 12-month period]; and
 - b. the actual VOC emissions from R001, R002, R003 and R004, combined, for the previous 12-month period.
- 9. The permittee shall maintain on site the work practice implementation plan requirements in sections B.3 through B.12 and all records associated with fulfilling the requirements of that plan, including, but not limited to the following:
 - a. records demonstrating that the operator training program required by section B.4 is in place;
 - b. records collected in accordance with the inspection and maintenance plan required by section B.5;
 - c. records associated with the cleaning solvent accounting system required by section B.6;
 - d. 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 semiannual period as required by section B.10; and

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- e. copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
10. The permit to install for these emissions units were evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";
or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: xylene

TLV (mg/m³): 434.2

Maximum Hourly Emission Rate (lbs/hr): 2.30

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 1396

MAGLC (ug/m³): 10,338

The permittee, has demonstrated that emissions of xylene, from emissions units R001, R002, R003, R004, combined is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

11. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack

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diameter, etc.).

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

12. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
13. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the

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change and if the change would increase the ground-level concentration.

14. The permittee shall conduct periodic inspections of the dry filtration system to determine whether the system is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the dry filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer of the dry filtration system, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency.

In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair for the dry filtration system to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.

15. The permittee shall document each inspection (periodic and annual) of the dry filtration system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each 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.
16. In the event that the dry filtration system are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry filtration system shall be expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the dry filtration system is not operating in accordance with such requirements.

D. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were not in service or not operated in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee 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.

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2. The permittee shall submit quarterly deviation reports that identify:
 - a. for the days during which a photochemically reactive material was employed, each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such incident;
 - b. for the days during which a photochemically reactive material was not employed, each day during which the average VOC emissions from the coatings and cleanup materials exceeded the pounds per hour limitation, and the actual average VOC emissions for each such day;
 - c. each day during which the VOC content of any coating exceeded the pounds per gallon limitation and the actual VOC content of each such coatings employed; and
 - d. any exceedance of the annual VOC emission limitation, as a rolling, 12-month summation and the VOC emissions during such period.

*based upon the premise that 100% of the solvent in the coating and cleanup material employed is emitted.

The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding section D.2.a and the opening phrase of section D.2.b that references photochemically reactive material.]

3. The permittee shall submit semiannual compliance certifications that state:
 - a. 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;
 - b. compliant coatings for strippable spray booth materials have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant coatings for strippable spray booth materials were used., the reasons for the use of noncompliant coatings, and the amounts and VOC

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contents of each noncompliant coating used; and

- c. 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.

The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification. This report shall be postmarked or delivered no later than July 30 and January 30 following the end of each 6-month period to the Director (Ohio EPA, Northeast District Office).

4. The permittee shall also submit an annual report of the total annual VOC emissions. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year to the Director (Ohio EPA, Northeast District Office).
5. The permittee shall submit annual reports to Ohio EPA Northeast District Office, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

E. Testing Requirements

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

8 pounds per hour of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in section C.5.f based upon the record keeping requirements specified in section C.5.
 - b. Emission Limitation:

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40 pounds per day of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in section C.5.d based upon the record keeping requirements specified in section C.5.

c. Emission Limitation:

25.91 pounds VOC emissions per hour for each day that photochemically reactive materials are not employed.

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in section C.6.g based on the record keeping requirements specified in section C.6.

d. Emission Limitation:

79.9 tons of VOC emissions per rolling, 12-month period from all coatings, washoff, strippable spray booth material and cleanup material from R001, R002, R003 and R004, combined

Applicable Compliance Method:

Compliance shall be demonstrated by the value recorded in section C.8 based on the record keeping requirements specified in sections C.4, C.5, C.6, C.7 and C.9.

e. Emission Limitations:

4.71 pounds per gallon, as applied for all sealer and topcoat

1.8 pounds of VOC per pound of solids, as applied, for any topcoat except for acid-cured alkyd amino conversion varnish topcoats

2.0 pounds of VOC per pound of solids, as applied, for any acid-cured alkyd amino conversion varnish topcoat

1.9 pounds of VOC per pound of solids, as applied, for any sealer, except for acid-cured alkyd amino sealers

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2.3 pounds of VOC per pound of solids, as applied, for any acid-cured alkyd amino sealer

0.8 pound of VOC per pound of solids, as applied, for any strippable spray booth material

Applicable Compliance Method:

Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-15(I)(4), the permittee shall determine the composition of the coatings by using a certified product data sheet that provides data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding sections E.1.a and E.1.b, by voiding the reference to photochemically reactive materials in section E.1.c and by voiding the reference to section C.5 in section E.1.d.]

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F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-31-05, the following terms and condition of this permit to install are federally enforceable: A through F, except C.10, C.11, C.12, C.13 and D.5.
2. The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 02-20418 issued on June 21, 2005.

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

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment - (R004) - wood part coating in a booth with one air-assisted spray gun/pump. Parts are manually moved and air dried.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	See sections A.2.b, A.2.d and B.3 through B.12 below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C). and OAC rule 3745-17-11(C)
OAC rule 3745-21-07(G)(2)	See section A.2.a below.
OAC rule 3745-31-05(C)	See sections A.2.c and B.1 below.
OAC rule 3745-17-11(C)	See sections B.2 below.

2. Additional Terms and Conditions

- 2.a Each day that a photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] is employed, the organic compound (OC) emissions from all coatings and from photochemically reactive materials shall not exceed 8 pounds per hour and 40 pounds per day. OC emissions from cleanup material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

The OC emission limitations of 8 pounds per hour and 40 pounds per day when photochemically reactive coatings or clean up materials are employed shall cease to be effective and federally enforceable on the date the U.S. EPA approves the revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, the emission limitations, monitoring, record keeping, reporting and testing requirements related to these hourly and daily limitations included in sections C.5, D.2.a,

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E.1.a and E.1.b shall be void.

- 2.b** Each day that photochemically reactive materials [as defined in OAC rule 3745-21-01(C)(5)] are not employed, the volatile organic compound (VOC) emissions from coatings and cleanup materials shall not exceed 20.25 pounds per hour, as a daily average. This limit is based upon the maximum application rate of 3.5 gallons per hour.

The requirement to comply with this emissions limitation only on days photochemically reactive coating or clean up material are employed shall cease on the date the U.S. EPA approves revisions to OAC rule 3745-21-07(G) as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, this emissions limitation shall be effective every day the emissions unit is in operation.

- 2.c** The VOC emissions from all VOC-containing material employed in this emissions unit and in emissions units R001, R002, R003 and R004, combined, shall not exceed 79.9 tons per rolling, 12-month period.

- 2.d** The VOC content of topcoats, sealers and strippable spray booth materials shall not exceed:

- i. 1.8 pounds of VOC per pound of solids, as applied, for any topcoat except for acid-cured alkyd amino conversion varnish topcoats;
- ii. 2.0 pounds of VOC per pound of solids, as applied, for any acid-cured alkyd amino conversion varnish topcoat;
- iii. 1.9 pounds of VOC per pound of solids, as applied, for any sealer, except for acid-cured alkyd amino sealers;
- iv. 2.3 pounds of VOC per pound of solids, as applied, for any acid-cured alkyd amino sealer; and
- v. 0.8 pound of VOC per pound of solids, as applied, for any strippable spray booth material.

- 2.e** The VOC content of each coating shall not exceed 5.17 pounds per gallon, as applied.

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B. Operational Restrictions

1. The maximum coating usage for this emissions unit and emissions unit R001, R002, R003 and R004, combined, shall not cause emissions to exceed 79.9 tons of VOC per rolling, 12 months, calculated using the following formula:

$$79.9 \text{ tons VOC} \geq \sum_{n=1}^i \frac{(P_i)(VOC_i)}{2000 \text{ lbs/ton}}$$

where:

P_i = usage of coating i in gallons; and
 VOC_i = VOC content of coating i in pounds VOC per gallon.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the VOC coating usage, upon issuance of this permit.

2. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.

The permittee shall operate and maintain the dry filtration system for the coating operations in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s) with any modifications deemed necessary by the permittee; and all such documentation from the manufacturer and the record of any modifications determined necessary by the permittee or operator shall be maintained as a facility record and shall be made available to the Ohio EPA upon request.

3. The permittee shall prepare and maintain written work practices that define environmentally desirable work practices for each wood furniture manufacturing operation and address each of the work practices in sections C.4 through C.12.
4. The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the requirements of this subpart. All new personnel, those hired after the issuance of this permit, shall be trained upon hiring. All existing personnel, those hired before the issuance of this permit, shall be trained within six months of the issuance of this permit. All personnel shall be given refresher training annually.

The permittee shall develop the plan within 60 days after issuance of this permit and shall maintain a copy of the training program with the work practice implementation

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plan on site. The training program shall include, at a minimum, the following:

- a. a list of all current personnel by name and job description that are required to be trained;
 - b. an outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
 - c. lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
 - d. a description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
5. The permittee source shall prepare and maintain with the work practice implementation plan, a written leak inspection, and maintenance plan that specifies:
- a. a minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or VOC solvents;
 - b. an inspection schedule;
 - c. methods for documenting the date and results of each inspection and any repairs that were made; and
 - d. the timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - i. a first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and
 - ii. final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within 3 months.
6. The permittee shall develop a VOC solvent accounting form to record:

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- a. the quantity and type of VOC solvent used each month for washoff and cleaning, as defined in § 63.801 of 40 CFR Part 63, Subpart JJ;
 - b. the number of pieces washed off, and the reason for the washoff; and
 - c. the quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled on site or disposed off site.
7. The permittee shall not use compounds containing more than 8.0 percent, by weight, of VOC to clean spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished.
 8. The permittee shall use no more than 1.0 gallon of VOC solvent per booth to prepare the surface of the booth prior to applying the booth coating, if the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced.
 9. The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
 10. The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
 - a. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - b. For touchup and repair under the following conditions:
 - i. The touchup and repair occurs after completion of the finishing operation; or
 - ii. The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - c. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
 - d. The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application

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technology. The permittee shall demonstrate technical or economic infeasibility by submitting to the Director a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:

- i. The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - ii. The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
11. The permittee shall pump or drain all VOC solvent used for line cleaning into a normally closed container.
 12. The permittee shall collect all VOC solvent used to clean spray guns into a normally closed container.

C. Monitoring and/or Record Keeping 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 daily:
 - a. the company identification for each sealer, topcoat and strippable spray booth material employed;
 - b. the type of material, (i.e., acid-cured alkyd amino sealer); and
 - c. the VOC content of each material, as applied, in pounds VOC per pound of solids.

The as applied formulation of the material shall include any thinner, catalyst or other material added prior to application.

3. The permittee shall collect and record the following information daily:

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- a. the company identification for each cleanup material employed; and
 - b. the VOC content of each material, in percent by weight.
4. The permittee shall collect and record the following information and day the spray booth is being refurbished:
- a. the company identification for each cleanup material employed;
 - b. the number of gallons of each cleanup material employed, (gallons dispensed minus gallons recovered for proper disposal);
 - c. the VOC content of each cleanup material, in pounds VOC per gallon; and
 - d. the total VOC emissions, in lbs/day.
5. The permittee shall collect and record the following information for each day that photochemically reactive coatings, washoff or cleanup material are employed in this emissions unit:
- a. the company identification for each coating, washoff and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating, washoff and photochemically reactive cleanup material employed;
 - c. the OC content of each coating, washoff and photochemically reactive cleanup material, in pounds OC per gallon;
 - d. the total emissions rate for all coatings, washoff and photochemically reactive cleanup materials, in pounds OC per day;
 - e. the total number of hours the emissions unit was in operation;
 - f. the average hourly OC emission rate for all coatings, washoff and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average);
 - g. the VOC content of each coating, washoff and photochemically reactive cleanup material, in pounds VOC per gallon; and
 - h. the total emissions rate for all coatings, washoff and photochemically reactive

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cleanup materials, in pounds VOC per day.

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

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, section C.2 will be voided entirely.]

6. The permittee shall collect and record the following information for each day that photochemically reactive coatings, washoff or cleanup materials are not employed in this emissions unit:
 - a. the company identification for each coating and washoff employed;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
 - c. the number of gallons of each coating washoff employed;
 - d. the VOC content of each coating and washoff, in lbs/gallon;
 - e. the total VOC emission rate for all coatings and washoff, in lbs/day;
 - f. the total number of hours the emissions unit was in operation; and
 - g. the average hourly VOC emission rate for all coatings and washoff, i.e., (e)/(f), in lbs/hr.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, the records required by this section shall be kept on a daily basis with no reference to photochemically reactive materials.]

7. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each cleanup material and strippable spray booth materials;

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- b. documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
- c. the VOC content of each nonphotochemically cleanup material and strippable spray booth materials, in lbs/gallon;
- d. the number of gallons of each material employed minus the number of gallons of cleanup material recovered for disposal; and
- e. the total VOC emissions from all nonphotochemically cleanup materials and strippable spray booth materials employed, in tons per month, i.e., sum of (c) times (d).

[Note: Records of nonphotochemically reactive cleanup material shall be recorded monthly according to section C.7 above. After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding any reference to "nonphotochemically reactive" and voiding the reference to section C.7.b.]

- 8. The permittee shall collect and record the following information for each month for the emissions unit to demonstrate compliance with the synthetic minor operational restrictions:
 - a. the actual VOC emissions from all coatings and cleanup materials for the previous, 12-month period [i.e., sum of the daily VOC emissions (terms C.4.d + C.5.h + C.6.e + and the strippable spray booth material records in section C.9) and the monthly non-photochemically reactive cleanup material VOC emission (term C.7.e) for the previous, 12-month period]; and
 - b. the actual VOC emissions from R001, R002, R003 and R004, combined, for the previous 12-month period.
- 9. The permittee shall maintain on site the work practice implementation plan requirements in sections B.3 through B.12 and all records associated with fulfilling the requirements of that plan, including, but not limited to the following:
 - a. records demonstrating that the operator training program required by section B.4 is in place;
 - b. records collected in accordance with the inspection and maintenance plan required by section B.5;

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- c. records associated with the cleaning solvent accounting system required by section B.6;
 - d. 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 semiannual period as required by section B.10; and
 - e. copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
10. The permittee shall calculate and record annually the total VOC emissions from all coatings, cleanup materials, washoff and strippable spray booth material, as a sum of the records required in sections C.4, C.5, C.6, C.7 and the strippable spray booth material records in section C.9.
11. The permit to install for these emissions units were evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee in the permit application. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN 3.0, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";
or

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- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: xylene

TLV (mg/m3): 434.2

Maximum Hourly Emission Rate (lbs/hr): 2.30

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1396

MAGLC (ug/m3): 10,338

The permittee, has demonstrated that emissions of xylene, from emissions units R001, R002, R003, R004, combined is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- 12. Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model

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the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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

13. The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

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- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
14. The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
15. The permittee shall conduct periodic inspections of the dry filtration system to determine whether the system is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee. The periodic inspections of the dry filtration system shall be performed at a frequency that is based upon the recommendation of the manufacturer of the dry filtration system, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency.

In addition to these periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry filtration system while the emissions unit is shut down and perform any needed maintenance and repair for the dry filtration system to ensure that it is able to routinely operate in accordance with the manufacturer's recommendations.
16. The permittee shall document each inspection (periodic and annual) of the dry filtration system and shall maintain the following information:
 - a. the date of the inspection;
 - b. a description of each 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.
17. In the event that the dry filtration system are not operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee, the dry filtration system shall be

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expeditiously repaired or otherwise returned to operation in accordance with such requirements. The permittee shall maintain documentation of those periods when the dry filtration system is not operating in accordance with such requirements.

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D. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any daily record showing that the dry filters were not in service or not operated in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee 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 submit quarterly deviation reports that identify:
 - a. for the days during which a photochemically reactive material was employed, each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such incident;
 - b. for the days during which a photochemically reactive material was not employed, each day during which the average VOC emissions from the coatings and cleanup materials exceeded 18.10 pounds per hour, and the actual average VOC emissions for each such day;
 - c. each day during which the VOC content of any coating exceeded 5.17 pounds per gallon and the actual VOC content of each such coatings employed; and
 - d. any exceedance of the coating and cleanup material usage restriction, as a rolling, 12-month summation and the actual usage during such period.

*based upon the premise that 100% of the solvent in the coating and cleanup material employed is emitted.

The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding section D.2.a and the opening phrase of section D.2.b that references photochemically reactive material.]

3. The permittee shall submit semiannual compliance certifications that state:

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- a. 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;
- b. compliant coatings for strippable spray booth materials have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant coatings for strippable spray booth materials were used., the reasons for the use of noncompliant coatings, and the amounts and VOC contents of each noncompliant coating used; and
- c. 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.

The compliance certification shall identify and describe any corrective actions considered and implemented for any noncompliance being reported in the compliance certification. This report shall be postmarked or delivered no later than July 30 and January 30 following the end of each 6-month period to the Director (Ohio EPA, Northeast District Office).

4. The permittee shall also submit an annual report of the total annual VOC emissions. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year to the Director (Ohio EPA, Northeast District Office).
5. The permittee shall submit annual reports to Ohio EPA Northeast District Office, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

E. Testing Requirements

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

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8 pounds per hour of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in section C.5.f based upon the record keeping requirements specified in section C.5.

b. Emission Limitation:

40 pounds per day of OC emissions for each day that photochemically reactive materials are employed.

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in section C.5.d based upon the record keeping requirements specified in section C.5.

c. Emission Limitation:

20.25 pounds VOC emissions per hour for each day that photochemically reactive materials are not employed.

Applicable Compliance Method:

Compliance shall be demonstrated by the daily values calculated in section C.6.g based on the record keeping requirements specified in section C.6.

d. Emission Limitation:

79.9 tons of VOC emissions per rolling, 12-month period from all coatings, washoff, strippable spray booth material and cleanup material from R001, R002, R003 and R004, combined

Applicable Compliance Method:

Compliance shall be demonstrated by the value recorded in section C.8 based on the record keeping requirements specified in sections C.4, C.5, C.6, C.7 and

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C.9.

e. Emission Limitations:

1.8 pounds of VOC per pound of solids, as applied, for any topcoat except for acid-cured alkyd amino conversion varnish topcoats

2.0 pounds of VOC per pound of solids, as applied, for any acid-cured alkyd amino conversion varnish topcoat

1.9 pounds of VOC per pound of solids, as applied, for any sealer, except for acid-cured alkyd amino sealers

2.3 pounds of VOC per pound of solids, as applied, for any acid-cured alkyd amino sealer

0.8 pound of VOC per pound of solids, as applied, for any strippable spray booth material

Applicable Compliance Method:

Any determination of VOC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-15(I)(4), the permittee shall determine the composition of the coatings by using a certified product data sheet that provides data determined by an analysis of each coating, as applied, by Reference Method 24 or Method 24A. If, pursuant to section 11.4 of Method 24, 40 CFR Part 60, Appendix A (revised as of July 1, 2001), an owner or operator determines that Method 24 or Method 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 and/or Method 24A.

[Note: After the revision to OAC rule 3745-21-07(G) is approved into the Ohio SIP, this section shall be revised by voiding sections E.1.a and E.1.b, by voiding the reference to photochemically reactive materials in section E.1.c and by voiding the reference to section C.5 in section E.1.d.]

F. Miscellaneous Requirements

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1. In accordance with the provisions of OAC rule 3745-31-05, the following terms and condition of this permit to install are federally enforceable: A through F, except C.10, C.11, C.12, C.13 and D.5.

2. The terms and conditions contained in this permit for this emissions unit shall supersede all the air pollution control requirements for the emissions unit contained in the permit to install 02-20418 issued on June 21, 2005.

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SIC CODE 2511 SCC CODE 40201901 EMISSIONS UNIT ID R001

EMISSIONS UNIT DESCRIPTION wood part coating operation in a booth with dry overspray filters, one air-assisted spray pump/gun. Parts manually moved and air dried.

DATE INSTALLED mod after PTI issued

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	20.25		20.25	79.9
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
20.25 lbs/hr VOC - maximum application rate times the highest VOC content coating use of dry filter for overspray 17-11(C)
Compliance with OAC rule 3745-21-15(D)(2) and the work practices

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: xylene

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SIC CODE 2511 SCC CODE 40201901 EMISSIONS UNIT ID R002

EMISSIONS UNIT DESCRIPTION wood part coating in a booth with dry overspray filters and one air-assisted spray pump/gun. Parts are manually moved and air dried.

DATE INSTALLED mod after PTI issued

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

Table with 6 columns: Pollutants, Air Quality Description, Actual Emissions Rate (Short Term Rate, Tons Per Year), and PTI Allowable (Short Term Rate, Tons Per Year). Rows include Particulate Matter, PM10, Sulfur Dioxide, Organic Compounds (attainment, 14.13), Nitrogen Oxides, Carbon Monoxide, Lead, and Other: Air Toxics.

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

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

14.13 lbs/hr VOC - maximum application rate times the highest VOC content coating use of dry filter for overspray 17-11(C) Compliance with OAC rule 3745-21-15(D)(2) and the work practices

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

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

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: xylene

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SIC CODE 2511 SCC CODE 40201901 EMISSIONS UNIT ID R003
 EMISSIONS UNIT DESCRIPTION wood part coating in a booth with dry overspray filters and one air-assisted spray pump/gun. Parts are manually moved and air dried.
 DATE INSTALLED 1/2008

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	25.91		25.91	79.9
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

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

25.91 lbs/hr VOC - maximum application rate times the highest VOC content coating use of dry filter for overspray 17-11(C) Compliance with OAC rule 3745-21-15(D)(2) and the work practices

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes
 OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*? X YES NO

IDENTIFY THE AIR CONTAMINANTS: xylene

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SIC CODE 2511 SCC CODE 40201901 EMISSIONS UNIT ID R004

EMISSIONS UNIT DESCRIPTION wood part coating in a booth with one air-assisted spray gun/pump. Parts are manually moved and air dried.

DATE INSTALLED 1/2008

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

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter					
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	20.25		20.25	79.9
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD?

OFFSET POLICY?

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

Enter Determination

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT?

\$

TOXIC AIR CONTAMINANTS

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

AIR TOXICS MODELING PERFORMED*?

X

YES

 NO

IDENTIFY THE AIR CONTAMINANTS:

xylene