



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-18612

DATE: 11/13/2003

The Will-Burt Company, Plant 8
Jeff Martin
PO Box 900 169 South Main Street
Orrville, OH 44667

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

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

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

Sincerely,

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

cc: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 11/13/2003
Effective Date: 11/13/2003**

FINAL PERMIT TO INSTALL 02-18612

Application Number: 02-18612
APS Premise Number: 0285010083
Permit Fee: **\$200**
Name of Facility: The Will-Burt Company, Plant 8
Person to Contact: Jeff Martin
Address: PO Box 900 169 South Main Street
Orrville, OH 44667

Location of proposed air contaminant source(s) [emissions unit(s)]:
**169 South Main Street
Orrville, Ohio**

Description of proposed emissions unit(s):
Paint Line 1.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

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

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

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

The Will-Burt Company, Plant 8
PTI Application: 02-18612
Issued: 11/13/2003

Facility ID: 0285010083

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	5.8
PE	2.4

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

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
		OAC rule 3745-21-09(U)(1)(d)
R003 - Paint Line No.1 (two paint booths with dry exhaust filters and multiple spray guns)	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-07(A)(1)
		OAC rule 3745-17-11(B)(1)
		40 CFR Part 60, Subpart EE

OAC rule 3745-21-09(I)

The W**PTI A****Issued: 11/13/2003**Emissions Unit ID: **R003**

Applicable Emissions
Limitations/Control Measures

3.0 lbs VOC/gallon of coating, excluding water and exempt solvents, for surface coating of metal furniture

Maximum usage of 10 gallons coating per day for coating metal furniture and miscellaneous metal parts

31.0 pounds VOC per day and 5.7 tons VOC per year when coating metal furniture and miscellaneous metal parts

14.4 pounds VOC per month and 0.087 tons VOC per year when using cleanup material

Visible emissions shall not exceed 5% opacity as a six-minute average, except as provided by rule

Particulate emissions shall not exceed 0.551 pound per hour and 2.4 tons per year

The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)

Exempt. See section A.2.a.

The emission limitation specified by this rule is less stringent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)

The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3)

See section A.2.b.

2. Additional Terms and Conditions

2.a OAC rule 3745-21-09(U)(2)(e)(iii) states that the requirements of OAC rule 3745-21-09(U)(1) shall not apply when coating miscellaneous metal parts when no more than ten gallons are used per day.

2.b If the permittee uses less than 3,842 liters (1,015 gallons) of metal furniture coatings (as applied) per calendar year and keeps purchase or inventory records or other data necessary to substantiate annual coating usage, the permittee shall be exempt from all other provisions of Subpart EE, 40 CFR 60.313.

If the permittee uses more than 3,842 liters (1,015 gallons) of metal furniture coatings (as applied) per calendar year and thereafter the permittee shall emit no more than 0.90 kilogram of VOC per liter of coating solids applied, based on a monthly volume-weighted average.

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit:
 - a. the name and identification number of each coating, as applied,
 - b. the VOC content (excluding water and exempt solvents) and the number of gallons of each coating (excluding water and exempt solvents), as applied,
 - c. the total VOC emissions, in pounds per day, from the coatings employed as calculated by the following equation:

- T = the sum of the product of A times B for each coating applied,
- A = mass of VOC per volume of coating (excluding water and exempt solvents), as applied, in units of pounds VOC per gallons,
- B = volume of coating (excluding water and exempt solvents), as applied, in units of gallons per day.

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

- a. the name and identification of each cleanup material employed,
- b. the number of gallons of each cleanup material employed,
- c. the VOC content of each cleanup material, in pounds per gallon,
- d. the total VOC emissions from all cleanup materials employed, in pounds per month, calculated by the following equation:

T_c = the sum of the product of A times B for each cleanup material employed,

A_c = mass of VOC per volume of cleanup material, in pounds VOC per gallon,

B_c = volume of cleanup material employed, in gallons per month.

3. The permittee shall perform monthly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions,
- b. whether the emissions are representative of normal operations,
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions,
- d. any corrective actions taken to eliminate the visible emissions.

4. If the permittee uses more than 3,842 liters (1,015 gallons) of metal furniture coatings per year, during that year and thereafter if the permittee uses a non-complying coating during any month, the permittee shall maintain the following monthly records for all the metal furniture coatings:
 - a. the identification of each coating,
 - b. the volume of each coating consumed, as received (liters) [B],
 - c. the density of each coating, as received (kilograms per liter)[C],
 - d. the proportion of VOC in each coating, as received (fraction by weight) [D],
 - e. the volume of each VOC-solvent diluent added to each coating (liter) [E],
 - f. the density of each diluent VOC-solvent (kilograms per liter) [F],
 - g. the mass of VOC used during each month [G], i.e., $G = (B_i)(C_i)(D_i) + \dots (B_n)(C_n)(D_n) + (E_i)(F_i) + \dots (E_n)(F_n)$, where: n = the total number of surface coatings employed in the emissions unit during the month; and i = subscript denoting a specific coating employed,
 - h. the proportion of solids in each coating, as received (fraction by volume) [H],
 - i. the total volume of coating solids used in each calendar month [I]; i.e., $I = (B_i)(H_i) + \dots (B_n)(H_n)$,
 - j. the transfer efficiency (fraction) [J] as specified in Table 1 of 40 CFR 60.313, Subpart EE, and
 - k. the average VOC emissions per unit volume of coating solids applied [K]; i.e., $K = G/(I)(J)$.
5. The permittee shall conduct an initial compliance test for any new metal furniture coatings brought into the facility and used to coat metal furniture. The initial compliance test shall be performed in accordance with the requirement in 40 CFR 60, Subpart EE.
6. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using

data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following table summarizes the results of the modeling:

Compound	TLV (ug/m ³)	MAGLC = TLV/42 (ug/m ³)	Emission rate (grams/sec)	Predicted 1-hr max ground level conc. (ug/m ³)	MAGLC exceeded (Y/N)
ethylene glycol monobutyl ether	131,043	3,120.1	0.13	43.89	N

7. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH), " than the lowest TLV value previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii)), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change(s).

Emissions Unit ID: **R003**

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

D. Reporting Requirements

1. The permittee shall submit a deviation (excursion) report for each calendar quarter which includes the following information for this emissions unit, R003.
 - a. an identification of each day during which a coating used for metal furniture coating contained more than 3.0 pounds VOC per gallon of coating,
 - b. an identification of each day during which more than ten (10) gallons of coating was used for coating metal furniture and miscellaneous metal parts.
 - c. an identification of each day during which the calculated VOC emission when coating metal furniture and miscellaneous metal parts exceeded 31.0 pounds per day.
 - d. an identification of each month within the quarter during which the calculated VOC emission when using cleanup material exceeded 14.4 pounds per month.
2. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
3. The permittee shall submit annual reports of the amount of metal furniture coatings used during each calendar year, i.e., January 1 through December 31. The report may include purchase or inventory records or other data necessary to document the annual metal furniture coating usage. The annual report shall be submitted annually, i.e., by January 31 for the previous calendar year.
4. If the permittee uses more than 3,842 liters (1,015 gallons) of metal furniture coatings (as applied) per year, the permittee shall notify the Ohio EPA Northeast District Office in writing of this and shall document any exceedances of Subpart EE during that year and any subsequent months. The notification shall include a copy of such record and shall be sent to the Ohio EPA Northeast

District Office within 45 calendar days after the exceedance occurs.

5. The permittee shall submit annual reports of the total VOC emissions from coating metal furniture and miscellaneous metal parts per calendar year. The total VOC emissions from use of cleanup material per calendar year shall also be reported. This report shall be submitted annually, i.e., by January 31 for the previous calendar year.

E. Testing Requirements

1. Emission Limitation:
3.0 lbs VOC per gallon of coating, excluding water and exempt solvents, for surface coating of metal furniture

Applicable Compliance Method:

U.S. EPA Method 24 shall be used, in accordance with OAC rule 3745-21-10(B), to determine the VOC contents for all coatings used for surface coating of metal furniture.

2. Emission Limitation:
31.0 pounds VOC per day and 5.7 tons VOC per year when coating metal furniture and miscellaneous metal parts.

Applicable Compliance Method:

Compliance with the daily VOC limit shall be determined based on the record keeping specified in section C.1.c. Compliance with the annual VOC limit (when coating metal furniture and miscellaneous metal parts) shall be determined by the summation of each daily VOC emission during a calendar year. This number is then multiplied by ton/2,000 pounds so that the annual emission may be reported in terms of tons per year.

3. Emission Limitation:
14.4 pounds VOC per month and 0.087 tons VOC per year when using cleanup material.

Applicable Compliance Method:

Compliance with the monthly VOC limit shall be determined based on the record keeping specified in section C.2.d. Compliance with the annual VOC limit (when using cleanup material) shall be determined by the summation of each monthly VOC emission during a calendar year. This number is then multiplied by ton/2,000 pounds so that the annual emission may be reported in terms of tons per year.

4. Emission Limitation:
Visible emissions shall not exceed 5% opacity as a six-minute average, except as provided by rule.

The Will-Burt Company, Plant 8

PTI Application: 02-19612

Issued

Facility ID: 0285010083

Emissions Unit ID: R003

Applicable Compliance Method:

If required by the Ohio EPA, compliance shall be determined in accordance with Method 9 of 40 CFR Part 60, Appendix A.

5. Emission Limitation:

Particulate emissions shall not exceed 0.551 pound per hour and 2.4 tons per year

Applicable Compliance Method:

If required by the Ohio EPA, compliance shall be determined in accordance with Methods 1-5 of 40 CFR part 60, Appendix A.

F. Miscellaneous Requirements

1. The terms and conditions of this permit supercede those contained in PTI # 02-0099.