



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov. Center

Application No: 03-13519

DATE: 10/15/2002

Sauder Woodworking Company
John Schlatter
502 Middle Street
Archbold, OH 43502

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Michael W. Ahern

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

CC: USEPA

NWDO



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: 10/15/2002
Effective Date: 10/15/2002**

FINAL PERMIT TO INSTALL 03-13519

Application Number: 03-13519
APS Premise Number: 0326000160
Permit Fee: **\$600**
Name of Facility: Sauder Woodworking Company
Person to Contact: John Schlatter
Address: 502 Middle Street
Archbold, OH 43502

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

**502 Middle St.
Archbold, Ohio**

Description of proposed emissions unit(s):

Installation of paper converting operation, laminating operations, and staining operations.

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. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.10 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

11. 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.

12. 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.

B. State Only Enforceable 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 Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 state-only required 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. 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.

4. 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.

5. 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.

6. 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.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

Sauder Woodworking Company

PTI Application: **03-13519**

Issued: 10/15/2002

Facility ID: **0326000160**

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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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)

<u>Pollutant</u>	<u>Tons Per Year</u>
OC	36.9

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Sauder Woodworking Company

PTI Application: **03-13519**

Issued: 10/15/2002

Facility ID: **0326000160**

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

1. This facility shall comply with all applicable requirements of 40 CFR Part 63, subpart JJ as well as with all the applicable requirements of subpart A of Part 63 (General Provisions), as identified in Table I of subpart JJ.
2. Work Practice Standards
 - a. This facility shall prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in paragraphs (b) through (l) of 40 CFR Part 63, subpart JJ, section 63.803. The written work practice implementation plan shall be developed no more than 60 days after 12/7/98 and shall be available for inspection by the Director upon request. If the Director determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (b) through (l) of section 63.803 or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Director may require this facility to modify the plan. Revisions or modifications to the plan do not require a revision of the source's Title V permit.
 - b. This facility shall train all new and existing employees, including contract personnel, who are involved in finishing, gluing, cleaning, washoff operations, use of manufacturing equipment, or implementation of the requirements of subpart JJ. All new personnel, those hired after 12/7/98, shall be trained upon hiring. All existing personnel, those hired before 12/7/98, shall be trained within six months of 12/7/98. All personnel shall be given refresher training annually. This facility shall maintain a copy of the training program with the work practice implementation plan.
 - c. The training program shall include, at a minimum, the following:
 - (1) a list of all current personnel by name and job description that are required to be trained;
 - ii. an outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
 - iii. 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
- iv. a description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
- d. This facility shall develop an organic HAP solvent accounting form to record the following:
- i. the quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in 63.801 of subpart JJ;
 - ii the number of pieces washed off, and the reason for the washoff; and
 - ii the quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.
- e. This facility shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of 40 CFR Part 63, subpart JJ in concentrations subject to MSDS reporting as required by OSHA.
- f. This facility shall not use compounds containing more than 8.0 percent, by weight, of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. 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, the affected source shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.
- g. This facility shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
- h. This facility shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:
- i. to apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - ii for touchup and repair under the following conditions:

- (a) the touchup and repair occurs after completion of the finishing operations;
or
 - (b) 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.
- iii. when spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
- iv. when emissions from the finishing application station are directed to a control device;
- v. 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
- vi. 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 affected source shall demonstrate technical or economic infeasibility by submitting to the Administrator 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:
 - (a) 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
 - (b) the excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.
- i. This facility shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.
- j. This facility shall collect all organic HAP solvent used to clean spray guns into a normally closed container.
- k. This facility shall prepare, and maintain with the work practice implementation plan a formulation assessment plan that:
 - i. Identifies VHAP from the list presented in Table 5 of 40 CFR Part 63, subpart JJ

that are being used in finishing operations by the affected source.

ii Establishes a baseline level of usage by the affected source for each VHAP identified in section 63.803(l)(1). The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in section 63.803(l)(1). For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying that amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined by using the equation in 63.805(d) or (e).

ii Tracks the annual usage of each VHAP identified in section 63.803(l)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.

iv If, after November 1998, the annual usage of the VHAP identified in section 63.803(l)(1) exceeds its baseline level, then this facility shall provide written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the facility from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

- (a) the exceedance is no more than 15.0 percent above the baseline;
- (b) usage of the VHAP is below the de minimis level presented in Table 5 of subpart JJ for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system), which is determined using the procedures in 63.805(d) or (e);
- (c) the affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or
- (d) the source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.

v. If None of the above explanations are the reason for the increase, the facility shall confer with the permitting authority to discuss the reason for the increase and

whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the facility needs to take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

- ii If after November 1998, an affected source uses a VHAP of potential concern for which a baseline level has not been previously established, then the baseline level shall be established as the de minimis level, based on 70 year exposure levels and data provided in the proposed rulemaking pursuant to Section 112(g) of the CAA, for that pollutant. A list of VHAP of potential concern is provided in Table 6 of subpart JJ.

If usage of the VHAP of potential concern exceeds the de minimis level, then the affected source shall provide an explanation to the permitting authority that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in paragraph (l)(4)(iv) of section 63.803, then the affected source shall follow the procedures established in section 63.803(l)(5).

3. This facility shall submit a compliance certification with the semiannual report required by 63.807(c). The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.
4. Recordkeeping Requirements
 - a. This facility shall fulfill all record keeping requirements of 63.10 of subpart A, according to the applicability criteria in 63.800(d) of subpart JJ.
 - b. This facility shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but not limited to:
 - i. records demonstrating that the operator training program required by 63.803(b) is in place;
 - ii records collected in accordance with the inspection and maintenance plan required by 63.803(c);

- iii records associated with the cleaning solvent accounting system required by 63.803(d);
 - iv records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by 63.803(h)(5);
 - v records associated with the formulation assessment plan required by 63.803(l); and
 - vii copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- c. This facility shall maintain records of all other information submitted with the compliance status report required by 63.9(h) and 63.807(b) and the semiannual reports required by 63.807(c).
 - d. This facility shall maintain all records in accordance with the requirements of 63.10(b)(1).

5. Reporting Requirements

- a. This facility shall fulfill all reporting requirements of 63.7 through 63.10 of subpart A (General Provisions) according to the applicability criteria in 63.800(d) of subpart JJ.
- b. This facility shall provide a written notification under section 63.803(l)(4) of subpart JJ. The notification shall include one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P316 - paper converting	OAC rule 3745-31-05(A)(3)	emissions from coatings/adhesives: 1.50 lbs organic compounds (OC)/hr & 6.6 tons OC/yr
		emissions from cleanup: 7.9 tons OC/yr
	OAC rule 3745-21-09(F)	2.9 pounds VOC per gallon of coating, excluding water and exempt solvents
	40 CFR Part 63, Subpart B	see A.I.2.a.

2. Additional Terms and Conditions

- 2.a Section 112(j) of the Clean Air Act as amended in 1990 requires an owner or operator of a major source to apply for a Title V permit should the U.S. EPA fail to promulgate emission standards for an applicable source category under Section 112(c) within 18 months after the promulgation deadline specified in the Act. The promulgation deadline for each source category was established through the regulatory schedule in accordance with Section 112(e) of the Act. The Title V permit that is issued must require the owner or operator to meet a Maximum Achievable Control Technology (MACT) emission limitation for all hazardous air pollutant (HAP) emissions within the source category. Regulations to implement Section 112(j) are codified in 40 CFR Part 63, Subpart B.

II. Operational Restrictions

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Sauder

PTI A₁

Issued: 10/15/2002

Emissions Unit ID: P316

None

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each coating/adhesive employed;
 - b. the OC content of each coating/adhesive employed, in pounds per gallon;
 - c. the VOC content of each coating/adhesive employed (excluding water and exempt solvents), in pounds per gallon, as applied;
 - d. the number of gallons of each coating/adhesive employed;
 - e. the OC emission rate for each coating/adhesive employed, (b x d), in pounds or tons;
 - f. the total OC emission rate for all coating/adhesives employed, (summation of e), in tons; and,
 - g. the annual, year-to-date OC emission rate for all coating/adhesive employed, (summation of f for each calendar month to date from January to December), in tons.

2. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds per gallon;
 - c. the number of gallons of each cleanup material employed;
 - d. the OC emission rate for each cleanup material employed, (b x c), in pounds or tons;
 - e. the total OC emission rate for all cleanup materials employed, (summation of d), in tons; and,
 - f. the annual, year-to-date OC emission rate for all cleanup materials employed, (summation of e for each calendar month to date from January to December), in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office) within 30 days following the date that the deviation occurs.
2. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the emissions limitations in Section A.1., as well as the corrective actions taken to achieve compliance. The reports shall be submitted by January 31 of each year and shall cover the previous 12-month period. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: 7.9 tons OC/yr

Applicable Compliance Method: Compliance with the annual emission limitation shall be determined by the record keeping specified in condition A.III.2.of this permit.

- b. Emission Limitation: 1.50 lbs organic compounds (OC)/hr & 6.6 tons OC/yr

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. Compliance with the annual emission limitation shall be determined by the record keeping specified in condition A.III.1.of this permit.

*Potential to emit for this emissions unit was established by multiplying the maximum OC content of 0.5% (0.005) of the coatings/adhesives by the maximum usage rate of 300 lbs/hr.

- c. Emission Limitation: 2.9 pounds VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method: Compliance shall be based upon the record keeping requirements specified in condition A.III.1. Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the VOC contents of the coatings.

VI. Miscellaneous Requirements

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Issued: 10/15/2002

Emissions Unit ID: P316

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P316 - paper converting	OAC rule 3745-31-05	

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

This emissions unit is not subject to the Ohio EPA's Air Toxic Policy as this emissions unit was installed prior to May 1986.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P319 - evergrain laminator	OAC rule 3745-31-05(A)(3)	emissions from adhesives: 1.38 lbs organic compounds (OC)/hr & 6.0 tons OC/yr
	40 CFR Part 63, subpart JJ	emissions from cleanup: 1.0 ton OC/yr
	OAC rule 3745-21-07(G)	None, see A.I.2.a.
		None, see A.II.1.

2. Additional Terms and Conditions

- 2.a This emissions unit, as it is presently operated, does not employ a coating or contact adhesive as defined in 40 CFR Part 63, subpart JJ. Therefore, this emissions unit is not subject to any of the facility permit requirements established under 40 CFR Part 63, subpart JJ.

II. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Recordkeeping Requirements

Issued

Emissions Unit ID: P319

1. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each adhesive employed;
 - b. the OC content of each adhesive employed;
 - c. documentation on whether or not each material employed is a photochemically reactive material;
 - d. the number of gallons of each adhesive employed;
 - e. the OC emission rate for each adhesive employed, (b x d), in pounds or tons;
 - f. the total OC emission rate for all adhesives employed, (summation of e), in tons; and,
 - g. the annual, year-to-date OC emission rate for all adhesives employed, (summation of f for each calendar month to date from January to December), in tons.

2. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each cleanup material employed;
 - b. the OC content of each cleanup material employed, in pounds per gallon;
 - c. documentation on whether or not each material employed is a photochemically reactive material;
 - d. the number of gallons of each cleanup material employed;
 - e. the OC emission rate for each cleanup material employed, (b x d), in pounds or tons;
 - f. the total OC emission rate for all cleanup materials employed, (summation of e), in tons; and,
 - g. the annual, year-to-date OC emission rate for all cleanup materials employed, (summation of e for each calendar month to date from January to December), in tons.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the

appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

2. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the emissions limitations in Section A.1., as well as the corrective actions taken to achieve compliance. The reports shall be submitted by January 31 of each year and shall cover the previous 12-month period. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: 1.0 ton OC/yr

Applicable Compliance Method: Compliance with the annual emission limitation shall be based upon the record keeping requirements specified in section A.III.2. of this permit.

- b. Emission Limitation: 1.38 lbs organic compounds (OC)/hr & 6.0 tons OC/yr

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. Compliance with the annual emission limitation shall be determined by the record keeping specified in section A.III.1.

*Potential to emit for this emissions unit was established by multiplying the maximum OC content of 0.055% (0.00055) of the adhesives by the maximum usage rate of 2500 lbs/hr.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P319 - evergrain laminator	OAC rule 3745-31-05	

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's annual emissions increase (as a result this modification), for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P802 - plant wide hand application of stain	OAC Rule 3745-31-05 (A)(3)	15.4 tons organic compounds (OC)/yr
	40 CFR Part 63.802(a)(1)	1.0 lb volatile hazardous air pollutant (VHAP)/lb solids, as applied (see A.I.2.a.)
	OAC rule 3745-21-07(G)	None (see A.II.1.)

2. Additional Terms and Conditions

- 2.a The permittee shall only use stains in this emissions unit that comply with the applicable emission limitation in 40 CFR Part 63, Subpart JJ, 63.802(a)(1), on an "as applied" basis.

II. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Recordkeeping Requirements

1. In order to demonstrate compliance with the allowable coating material content restriction of 1.0 pound VHAP/lb solids, as applied, the permittee shall maintain records of the following information:
 - a. a certified product data sheet for each stain (certified product data sheet defined in 40

CFR 63.801); and

- b. the VHAP content, in lbs VHAP/lb solids, of each stain, as applied.
2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the company identification for each stain employed;
 - b. the OC content of each stain employed, in pounds per gallon;
 - c. documentation on whether or not each material employed is a photochemically reactive material;
 - d. the number of gallons of each stain employed;
 - e. the OC emission rate for each stain employed, (b x d), in pounds or tons;
 - f. the total OC emission rate for all stains employed, (summation of e), in tons; and,
 - g. the annual, year-to-date OC emission rate for all stains employed, (summation of f for each calendar month to date from January to December), in tons.

IV. Reporting Requirements

1. The permittee shall submit semi-annual compliance certification reports, to the Director as required by 40 CFR Part 63, Subpart 63.807(c) that include the following information:
 - a. A statement that compliant stains have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance.
 - b. If the source was in noncompliance, the permittee should state the measures that were taken to bring the source into compliance.
2. Written notifications for annual VHAP usage exceedances (after November 1998) pertaining to the formulation assessment plan for finishing operations shall be submitted as required below:
 - a. The permittee shall submit a written notification to the Director within 30 days after the end of the year in which the annual usage of a VHAP exceeded a baseline level for that VHAP pursuant to Part II, section A.2.k.ii. The written notification shall provide the information as required by Part II, section A.2.k.iv.
 - b. The permittee shall submit a written notification to the Director within 30 days after the

end of the year in which the annual usage of a VHAP exceeded the de minimis level established for that VHAP pursuant to Part II, section A.2.k.vi. The written notification shall provide information required by Part II, section A.2.k.vi.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of photochemically reactive materials. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.
4. The permittee shall submit annual deviation (excursion) reports that identify any and all exceedances of the emissions limitations in Section A.1., as well as the corrective actions taken to achieve compliance. The reports shall be submitted by January 31 of each year and shall cover the previous 12-month period. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that year.

V. Testing Requirements

1. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating shall be determined in accordance with 40 CFR 63.802(a)(1), 63.803(l)(2), and 63.805(a). EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAP present in the coating. The EPA Method 311 shall then be used to quantify those VHAP identified through formulation data. The EPA Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during curing. For formaldehyde, the VHAP usage (and VHAP emissions) shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the VHAP usage (and VHAP emissions) shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. The EPA Method 24 (40 CFR, Part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of the Administrator that a coating does not release VOC or HAP byproducts during the curing, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. The owner or operator of an affected source may request approval from the Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless after consultation, a regulated source could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct.

Emissions Unit ID: P802

Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24," EPA-340/1-91-010.

2. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:

- a. Emission Limitation:
1.0 lb VHAP/lb solids, as applied

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emissions limit using the record keeping specified in section A.III.1.

- b. Emission Limitation
15.4 tons OC/yr

Applicable Compliance Method

Compliance with the annual emission limitation shall be determined by the record keeping specified in section A.III.2.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P802 - plant wide hand application of stain	OAC rule 3745-31-05	

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None