



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 03-13730

DATE: 4/8/2003

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

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 4/8/2003
Effective Date: 4/8/2003**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-13730

Application Number: 03-13730
APS Premise Number: 0326000160
Permit Fee: **\$0**
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):
UV post finishing production line modifications to record keeping requirements.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

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 Record keeping 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 record keeping 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 record keeping 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.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, 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 ninety (90) 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.

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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

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 record keeping 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

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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

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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.

8. 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.

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)
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	9.18
OC	12.32
PE	2.51

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 (National Emission Standards for Wood Furniture Manufacturing Operations) as well as with all the applicable requirements of subpart A of part 63 (General Provisions), as identified in Table 1 of subpart JJ.

2. Work Practice Standards:

a. Work Practice Implementation Plan:

The permittee 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 sections A.2.b through A.2.l, which are based on paragraphs (b) through (l) of 40 CFR 63.803. The written work practice implementation plan shall be developed in accordance with subpart JJ and shall be available for inspection by the Director or the Ohio EPA Northwest District Office upon request. If the Director or the Ohio EPA Northwest District Office determines that the work practice implementation plan does not adequately address each of the topics specified in paragraphs (b) through (l) of section A.2. or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Director or the Ohio EPA Northwest District Office 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. Operator Training Course:

The permittee 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 and all existing personnel shall be trained in accordance with subpart JJ. All personnel shall be given refresher training annually. The permittee shall maintain a copy of the training program with the work practice implementation plan.

The training program shall include, at a minimum, the following:

- i. 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.

c. Inspection and Maintenance Plan:

The permittee shall prepare, and maintain with the work practice implementation plan, a written leak inspection and maintenance plan that specifies the following:

- i. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
- ii. An inspection schedule;
- iii. Methods for documenting the date and results of each inspection and any repairs that were made;
- iv. The time frame between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
 - (a) A first attempt at repair (e.g., tightening of packing glands) shall be made no later than (5) five calendar days after the leak is detected; and
 - (b) 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) three months.

d. Cleaning and Washoff Solvent Accounting System:

The permittee 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
- iii. The quantity of spent solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

e. Chemical Composition of Cleaning and Washoff Solvents:

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The permittee 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. **Spray Booth Cleaning:**
The permittee 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 permittee 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. **Storage Requirements:**
The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
- h. **Application Equipment Requirements:**
The permittee 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;

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- 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

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- 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 permittee shall demonstrate technical or economic infeasibility by submitting to the Ohio EPA Northwest District Office a videotape, a technical report, or other documentation that supports the permittee's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the permittee'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. **Line Cleaning:**
The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.

- j. **Gun Cleaning:**
The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container.

- k. **Washoff Operations:**
The permittee shall control emissions from washoff operations by:
 - i. Using normally closed tanks for washoff; and
 - ii. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

- l. **Formulation Assessment Plan for Finishing Operations:**
The permittee 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 at this facility.
 - ii. Establishes a baseline level of usage by the affected source for each VHAP identified in section A.2.1.i. The baseline usage level shall be the highest annual

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usage from 1994, 1995, or 1996, for each VHAP identified in section A.2.1.i. 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 the amount of styrene monomer in the finishing material,

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- 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).
- iii. Tracks the annual usage of each VHAP identified in section A.2.1.i by the permittee that is present in amounts subject to MSDS reporting as required by OSHA.
 - iv. If, the annual usage of the VHAP identified in section A.2.1.i exceeds its baseline level, then the permittee shall provide written notification to the Ohio EPA Northwest District Office that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the permittee from further action, unless the affected facility operation 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;
 - (c) This facility 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 permittee shall confer with the Ohio EPA District Office 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 Ohio EPA Northwest District Office and permittee. If there are no practical and reasonable solutions, the permittee needs to take no further action. If there are solutions, the permittee 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.

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- vi. If the facility 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.

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If usage of the VHAP of potential concern exceeds the de minimis level, then the permittee shall provide an explanation to the Ohio EPA Northwest District Office that documents the reason for exceedance of the de minimis level. If the explanation is not one of those listed in paragraph A.2.1.iv., then the permittee shall follow the procedures established in section A.2.1.v.

3. Record keeping Requirements:

- a. The permittee shall fulfill all record keeping requirements of 40 CFR 63.10 of subpart A, according to the applicability criteria in section A.1.
- b. The permittee 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 section A.2.b. is in place;
 - ii. Records collected in accordance with the inspection and maintenance plan required by section A.2.c.;
 - iii. Records associated with the cleaning solvent accounting system required by section A.2.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 section A.2.h.v.;
 - v. Records associated with the formulation assessment plan required by section A.2.i.; and
 - vi. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- c. The permittee shall maintain records of all other information submitted with the written notifications required by section A.4.b. and the semiannual reports required by section A.4.c.
- d. As specified under 40 CFR 63.10(b)(1), the permittee shall maintain files of all information (including all reports and notifications) recorded in a form suitable and readily available for

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expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The

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remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

4. Reporting Requirements:

- a. The permittee shall fulfill all reporting requirements of 40 CFR 63.7 through 63.10 of subpart A (General Provisions) according to the applicability criteria in section A.1.
- b. For any written notification required under section A.2.1.iv., the permittee 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.
- c. The permittee shall submit semiannually a compliance certification on the work practice implementation plan. 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. The semiannual compliance certifications shall be submitted within 30 days after each six-month period to the Ohio EPA Northwest District Office. The six-month periods are January through June and July through December.

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

None

Saude

PTI A

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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>	
		40 CFR Part 63.802(b)(1)
R301 - UV post finishing coating production line (coating formulation, mixing and storage, bottom roll coater, bottom UV cure lamp, part clean off, spray booth with two reciprocating spray gun carriages, top and bottom UV cure lamps)	OAC 3745-31-05(A)(3)	
		40 CFR Part 63.803
	OAC rule 3745-21-07(G)(2)	
	OAC rule 3745-17-11(B)	
	OAC rule 3745-17-07(A)	

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Applicable Emissions
Limitations/Control
Measures

Work practice standards (see A.II.1)

Control requirements (see A.I.2.a)

1.97 lbs volatile organic compounds (VOC)/hr, 7.38 TPY VOC from coating operations

302 lbs VOC/mo., 1.80 TPY VOC from water treatment operations

2056.41 lbs OC/mo., 12.32 TPY OC from cleanup materials

0.67 lb particulate emissions (PE)*/hr, 2.51 TPY*

Visible particulate emissions shall not exceed 5% opacity, as a six-minute average

See A.I.2.c.

See A.II.1.

See A.I.2.b.

See A.I.2.b.

0.8 lb volatile hazardous air pollutants (VHAP)/lb solids, as applied for topcoats (see A.II.5)

*All PE is assumed to be PM₁₀.

2. Additional Terms and Conditions

- 2.a Best available technology (BAT) for this emissions unit has been determined to be use of a control system consisting of a water wash followed by packed-bed scrubber. The control system shall achieve a control efficiency of 99.9% for PE.
- 2.b The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- 2.c The requirements of the rule also include compliance with the requirements of 40 CFR Part 63, Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations.

II. Operational Restrictions

- 1. The permittee shall comply with the work practice implementation plan of 40 CFR Part 63, Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations, as outlined in Part II A.2. of this permit, immediately upon startup of this emissions unit.
- 2. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.
- 3. The permittee shall operate the water wash and scrubber whenever this emissions unit is in operation.
- 4. To ensure operation of the water wash and scrubber control system, the permittee shall employ an "electrical interlock system" that only allows operation of the emission unit when the control system is also operating.
- 5. The permittee shall only use coating materials in this emissions unit that comply with the applicable VHAP emission limitation in section A.I.1. on an "as applied" basis (0.8 lb VHAP/lb solids) for topcoats.

III. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain daily records that document any time periods when the electrical interlock system did not operate properly, allowing operation of the emission unit without water wash and proper scrubber control operation as indicated in section A.II. 4.
The permittee shall perform weekly 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. The total duration of any visible emission incident; and
 - e. Any corrective actions taken to eliminate the visible emissions.
2. The permittee shall collect and record the following information each month for coating material and water treatment material usage in emissions unit R301:
 - a. The company identification for each coating material and water treatment material employed;
 - b. Documentation of whether or not each coating and water treatment material employed is a photochemically reactive material;
 - c. The number of gallons of each coating material and water treatment material employed;
 - d. The volatile organic compound content, in pounds per gallon, for each coating and water treatment material employed;
 - e. The volatile organic compound emission rate for each coating and water treatment material employed, in lbs/month \times d);
 - f. The total volatile organic compound emission rate for all coating material employed [sum of (e) for coating materials];
 - g. The total volatile organic compound emission rate for all water treatment material employed [sum of (e) for water treatment materials];
 - h. The annual, year to date volatile organic compound emissions from all coating materials

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- employed (sum of (f) for each calendar month to date from January to December).
- i. The annual, year to date volatile organic compound emissions from all water treatment materials employed (sum of (g) for each calendar month to date from January to December).
3. The permittee shall collect and record the following information each month for cleanup material usage in emissions unit R301:
- a. The company identification of each cleanup material employed;
 - b. Documentation of whether or not each cleanup material employed is a photochemically reactive material;
 - c. The number of gallons of each cleanup material employed;
 - d. The organic compound content, in pounds per gallon, for each cleanup material employed;
 - e. The organic compound emission rate for each cleanup material employed, in lbs/month © x d);
 - f. The total organic compound emission rate for all cleanup materials employed [sum of (e)]; and
 - g. The annual, year to date organic compound emissions from all cleanup materials employed (sum of (f) for each calendar month to date from January to December).
4. In order to demonstrate compliance with the VHAP limits specified in section A.I.1., the permittee shall maintain records of the following information:
- a. A certified product data sheet for each topcoat; and
 - b. The VHAP content, in lbs VHAP/lb solids, as applied, of each topcoat.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate District Office or local air agency) in writing of any daily record showing that the electrical interlock system did not operate properly, allowing operation of the emission unit without water wash and scrubber control operation, as indicated in section A.II. 4. The notifications shall include a copy of such record and shall be sent

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to the Director (the appropriate District Office or local air agency) within 30 days after the event occurs.

2. The permittee shall notify the Director (the appropriate Ohio EPA District Office) 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) within 30 days following the end of the calendar month.
3. The permittee shall submit annual written reports of any deviations (excursions) from the annual volatile organic compound emission limitations for coating operations in section A.I.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year.
4. The permittee shall submit annual written reports of any deviations (excursions) from the annual volatile organic compound emission limitations for water treatment materials in section A.I.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year.
5. The permittee shall submit annual written reports of any deviations (excursions) from the annual organic compound emission limitations for cleanup materials in section A.I.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report, which states that no deviations occurred during that calendar year. The reports shall be submitted annually, by January 31 of each year and shall cover the previous calendar year.
6. Regarding the VHAP emission limitations in section A.I.1., the permittee shall submit semiannual compliance certification reports which state that compliant coating materials have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. The emissions unit is in violation of the applicable VHAP emissions limit whenever a noncompliant coating material, as demonstrated by records or by a sample of the coating material, is used. If the emissions unit was in noncompliance, the permittee shall state the measures that were taken to bring the emissions unit into compliance.

The semiannual compliance certification reports shall be submitted within 30 days after each six-month period to the Ohio EPA Northwest District Office. The six-month periods are January through June and July through December.

7. The permittee shall submit an initial compliance status report in accordance with 63.804(f)(2) and (3), 63.807(b), and 63.9(h) stating that compliant topcoats are being used by the affected source. The compliance status report shall be submitted no later than 60 days after the compliance date.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.I.1. of this permit to install shall be

determined in accordance with the following methods:

a. Emission Limitation

1.97 lbs VOC/hour from coating operations

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit*.

Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance.

*The potential to emit for this emissions unit was based on a maximum VOC content of 0.09 pound per gallon and a maximum hourly usage rate of 21.9 gallons per hour.

b. Emission Limitation

7.38 tons VOC/year from coating operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.2.

c. Emission Limitation

302 lbs VOC/month and 1.80 tons VOC/year from water treatment operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.2.

d. Emission Limitation

2056.41 lbs OC/month and 12.32 tons OC/year from cleanup operations

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.3.

e. Emission Limitation

0.67 lb PE/hour

Applicable Compliance Method

The permittee shall demonstrate compliance with the hourly limitation by utilizing the following equation:

$$E \text{ (hourly)} = \frac{\text{(maximum coating solids content in lbs/gal)} \times \text{(maximum gallon usage rate)}}{(1 - TE \text{ for rollcoater})(1 - CE \text{ for water wash and scrubber})}$$

where:

E (hourly) = PE rate in lbs/hr

Maximum Coating Solids Content = 8.69 lbs/gal

Maximum Gallon Usage Rate = 21.90 gals/hr

TE = Transfer Efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (assumed to be 65%)

CE = Control Efficiency of the control equipment (assumed to be 99% for water wash and scrubber)

If required, the permittee shall demonstrate compliance with the hourly limitation by testing in accordance with US EPA Methods 1-5 of 40 CFR Part 60, Appendix A.

- f. Emission Limitation:
2.51 tons PE/year

Applicable Compliance Method:

The tons/yr limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 7488 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- g. Emission Limitation
Visible particulate emissions shall not exceed 5% opacity, as a six-minute average

Applicable Compliance Method

If required, compliance shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

- h. Emission Limitation
0.8 lb VHAP/lb solids, as applied for topcoats

Applicable Compliance Method

Compliance shall be determined based upon the recordkeeping requirements specified in section A.III.6. and the procedures in sections A.V.2. and A.V.3.

2. The VHAP content, VHAP usage, and VHAP emissions of a liquid coating or solvent shall be determined in accordance with the following:
- 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. Method 311 shall then be used to

quantify those VHAP identified through formulation data. Method 311 shall not be used to quantify HAP such as styrene and formaldehyde that are emitted during cure. 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. 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 Ohio EPA that a coating does not release VOC or HAP byproducts during the cure, for example, all VOC and HAP present in the coating is solvent, then batch formulation information shall be accepted. In the event of any inconsistency between Method 24 or Method 311 test data and a facility's formulation data, that is, if the Method 24/311 value is higher, the Method 24/311 test shall govern unless after consultation, the permittee could demonstrate to the satisfaction of the enforcement agency that the formulation data were correct. Sampling procedures shall follow the guidelines presented in follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A," EPA- 340/1-91-010.

- b. The permittee may request approval from the USEPA Administrator to use an alternative method for determining the VHAP content of the coating.
3. Certified product data sheet (CPDS) means documentation furnished by coating or adhesive suppliers or an outside laboratory that provides:
- a. The VHAP content of a finishing material, contact adhesive, or solvent, by percent weight, measured using the EPA Method 311, or an equivalent or alternative method (or formulation data if the coating meets the criteria specified in section A.V.2.a.);
 - b. The solids content of a finishing material or contact adhesive by percent weight, determined using data from the EPA Method 24, or an alternative or equivalent method (or formulation data if the coating meets the criteria specified in section A.V.2.a.); and
 - c. The density, measured by EPA Method 24 or an alternative or equivalent method.

Therefore, the reportable VHAP content shall represent the maximum aggregate emissions potential of the finishing material, adhesive, or solvent in concentrations greater than or equal to 1.0 percent by weight or 0.1 percent for VHAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR part 1910), as formulated. Only VHAP present in concentrations greater than or equal to 1.0 percent

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by weight, or 0.1 percent for VHAP that are carcinogens, must be reported on the CPDS. The purpose of the CPDS is to assist the permittee in demonstrating compliance with the emission limitations on volatile hazardous air pollutants.

Note: Because the optimum analytical conditions under EPA Method 311 vary by coating, the coating or adhesive supplier may also choose to include on the CPDS the optimum analytical conditions for analysis of the coating, adhesive, or solvent using EPA Method 311. Such information may include, but not be limited to, separation column, oven temperature, carrier gas, injection port temperature, extraction solvent, and internal standard.

VI. Miscellaneous Requirements

None

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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>
R301 - UV post finishing coating production line (coating formulation, mixing and storage, bottom roll coater, bottom UV cure lamp, part clean off, spray booth with two reciprocating spray gun carriages, top and bottom UV cure lamps)	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Record keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

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None

VI. Miscellaneous Requirements

None