State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
FULTON COUNTY

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 03-17064
Fac ID: 0326000160

DATE: 3/28/2006

Sauder Woodworking Company
Carol Crisenbery
502 Middle Street
Archbold, OH 43502

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$200** will be due. Please do not submit any payment now.

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

Sincerely,

Michael W. Ahern

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

CC: **USEPA** **NWDO** **IN** **MI**

FULTON COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **03-17064** FOR AN AIR CONTAMINANT SOURCE FOR
Sauder Woodworking Company

On 3/28/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Sauder Woodworking Company**, located at **502 Middle St., Archbold**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-17064:

gluing operation

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

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 [(419)352-8461]

DRAFT PERMIT TO INSTALL 03-17064

Application Number:	03-17064
Facility ID:	0326000160
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	Sauder Woodworking Company
Person to Contact:	Carol Crisenbery
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):
Gluing operation

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

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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 (i.e., postmarked) quarterly, 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, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, 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. If this permit is for an emissions unit located at a Title V facility, then 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.

d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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 re-issuance, or modification

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, 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 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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 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 and the State and by citizens (to the extent allowed by section 304 of the Act) 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 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in

this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit 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)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Sauder Woodworking Company **Facility ID: 0326000160**
PTI Application: 03-17064
Issued: To be entered upon final issuance

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

Pollutant	Tons Per Year
VOC	11.7

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 40 CFR Part 63, 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 train in accordance with 40 CFR Part 63, 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:
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;

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 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.l.i. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in section A.2.l.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, 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.l.i by the permittee that is present in amounts subject to MSDS reporting as required by OSHA.

iv. If, in accordance with 40 CFR Part 63, the annual usage of the VHAP identified in section A.2.l.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.

vi. If, in accordance with 40 CFR Part 63, Subpart JJ, 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 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.l.iv., then the permittee shall follow the procedures established in section A.2.l.v.

3. Recordkeeping Requirements:

a. The permittee shall fulfill all recordkeeping 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.l.; 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 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 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.l.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

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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P524 - Cold Press	OAC rule 3745-31-05(A)(3)	2.66 lb organic compounds (OC)/hr & 11.7 tons OC/yr
	40 CFR Part 63, subpart JJ	See A.I.2.a.
	OAC rule 3745-21-07(G)	None, see A.II.1.

2. Additional Terms and Conditions

2.a The facility is an affected source as defined in 40 CFR Part 63, Subpart JJ, and as such is subject to the requirements in Part II.A.1. through Part II.A.4. of this permit. However, this emissions unit does not employ a coating or contact adhesive as defined in 40 CFR Part 63.801. Therefore, this emissions unit is not subject to any of the emission limits established under 40 CFR Part 63, subpart JJ.

2.b The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

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.

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 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 calender month to date from January to December), in tons.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day during which a photochemically reactive material was employed. Each report shall be submitted within 45 days after the deviation occurs.

2. The permittee shall submit annual reports that identify the total OC emissions from this emissions unit, in tons. These reports shall be submitted by January 31 of each year and shall cover the previous calendar 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 <u>Emission Limitation:</u> 2.66 lb organic compounds (OC)/hr & 11.7 tons OC/yr

   <u>Applicable Compliance Method:</u> 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 a maximum adhesive VOC content of 0.3045 lb/gallon, and multiplying by a maximum application rate of 8.75 gallons/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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
P524 - Cold Press	None	None

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