

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install #03-13511

A. Source Description

Sauder Woodworking Company, located in Archbold, OH, manufactures wood furniture products. This facility has installed and modified coating operations without first obtaining a Permit to Install. As part of the Findings and Orders for this enforcement action, the company was required to submit PTI applications for these sources to properly establish federally enforceable emission limits. Actual historic emissions have never exceeded the limits that are established in this permit to install.

B. Facility Emissions

This facility is currently considered a "PSD major" for permitting requirements. The facility is also subject to MACT requirements under JJ. The emission units in this PTI have organic compound emissions.

C. Operating Limitations

Sauder woodworking has requested a federally enforceable limit on their OC emissions from emissions unit R600. This restriction limits the gallon usage to 9770 gallons of coating per rolling 12-month period with an OC content restriction of 7.37 lbs per gallon of coating. This would restrict the potential emissions from the coating operations associated with emissions unit R600 to 36.0 tons of organic compounds per rolling 12-month period.

D. Conclusions

By restricting coating usage, the terms and conditions of this permit to install will limit the projects organic compound emissions to less than PSD thresholds. Excursion reports will be required to ensure compliance.



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 03-13511

DATE: 5/22/2003

Sauder Woodworking Company
John Schlatter
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 or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$600** 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.

Very truly yours,

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

CC: USEPA

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FULTON COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL 03-13511 FOR AN AIR CONTAMINANT SOURCE FOR SAUDER WOODWORKING COMPANY

On 5/22/2003 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 03-13511:

Modification of existing coating operations at the Sauder Manufacturing complex.

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]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 03-13511

Application Number: 03-13511
APS Premise Number: 0326000160
Permit Fee: **To be entered upon final issuance**
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):
Modification of existing coating operations at the Sauder Manufacturing complex.

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

Sauder Woodworking Company

Facility ID: 0326000160

PTI Application: 03-13511

Issued: To be entered upon final issuance

Part I - GENERAL TERMS AND CONDITIONS

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.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 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.

Sauder Woodworking Company

Facility ID: 0326000160

PTI Application: 03-13511

Issued: To be entered upon final issuance

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

Sauder Woodworking Company

Facility ID: 0326000160

PTI Application: 03-13511

Issued: To be entered upon final issuance

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.

Sauder Woodworking Company

Facility ID: 0326000160

PTI Application: 03-13511

Issued: To be entered upon final issuance

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

3. Permit Transfers

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

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may

Sauder Woodworking Company

Facility ID: 0326000160

PTI Application: 03-13511

Issued: To be entered upon final issuance

be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

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

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

6. Public Disclosure

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

7. Applicability

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

Issued: To be entered upon final issuance

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>
OC	62.3

13

Sauder Woodworking Company

PTI Application: 03-13511

Issued: To be entered upon final issuance

Facility ID: 0326000160

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PTI A

Emissions Unit ID: R600

Issued: To be entered upon final issuance**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;

Emissions Unit ID: R600

- 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.

Sauder Woodworking Company

PTI Application: 03-13511

Issued: To be entered upon final issuance

Facility ID: 0326000160

- 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.

Emissions Unit ID: R600

- 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

Sauder Woodworking Company

Facility ID: 0326000160

PTI Application: 03-13511

Issued: To be entered upon final issuance

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 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, 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

Sauder Woodworking Company

Facility ID: 0326000160

PTI Application: 03-13511

Issued: To be entered upon final issuance

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.
- 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

Sauder Woodworking Company**PTI Application: 03-12511****Issued****Facility ID: 0326000160**

Emissions Unit ID: R600

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.2.1.iv., then the permittee shall follow the procedures established in section A.2.1.v.

21

Sauder Woodworking Company

PTI Application: 03-13511

Issued: To be entered upon final issuance

Facility ID: 0326000160

Issued: To be entered upon final issuance

3. Record keeping 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.

Sauder Woodworking Company

PTI Application: 03-13511

Issued: To be entered upon final issuance

Facility ID: 0326000160

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

Emissions Unit ID: R600

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R600 - Front/Back Stain Booth	OAC 3745-31-05(A)(3)	39.95 lbs organic compounds (OC)/hr, from coating operations
		500.0 lbs OC/month and 3.0 tons OC /yr from cleanup materials
	OAC rule 3745-31-05(D)	36.0 tons OC per rolling 12 month period from coating operations, See A.I.2.c.
	OAC rule 3745-21-07(G)(2)	See A.II.2.
	OAC rule 3745-17-11(B)	See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	40 CFR Part 63.802(b)(1)	1.0 lb volatile hazardous air pollutants (VHAP)/lb solids for stains
40 CFR Part 63.803	Work practice standards (see A.II.1)	

2. Additional Terms and Conditions

- 2.a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11 (A) (2) (ii), this unit is exempt from the requirements of OAC rule 3745-17-11 (B) (2).

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- 2.b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07 (A) (3) (h) because OAC rule 3745-17-11 is not applicable.
- 2.c. The permittee has requested federally enforceable emission limitations of 36.0 tons OC per rolling 12-month period based on annual coating usage restrictions (See A.II.1).

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.
- 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 maximum OC content any coating employed in this emissions unit shall not exceed 7.37 lbs OC/gallon, on an "as applied" basis. The maximum annual coating usage rate for this emissions unit shall not exceed 9,770 gallons, based upon a rolling, 12-month summation of the coating usage rates. The permittee has existing coating usage rate records therefore the establishment of coating usage rates for the first 12 months of operation under the provisions of this permit are not necessary to ensure federal enforceability.

III. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall collect and record the following information each month for coating usage in this emissions unit on an "as applied" basis:
 - a. the company identification for each coating employed;
 - b. documentation of whether of not each coating employed is a photochemically reactive material;
 - c. the number of gallons of each coating employed;
 - d. the OC content, in pounds per gallon, for each coating employed;
 - e. the OC emission rate for each coating employed, in lbs/month © x d);
 - f. the total OC emission rate for all coatings employed [sum of (e) for coating materials];

Issued: To be entered upon final issuance

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. 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.

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**
39.95 lbs OC/hour and 36.0 tons OC per rolling 12 month period from coating operations

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance. Compliance with the annual emission limitation shall be determined based upon the recordkeeping requirements specified in section A.III.1.

*The potential to emit for this emissions unit was based on a maximum OC content of 7.37 pounds per gallon and a maximum hourly usage rate of 5.42 gallons per hour.

- b. **Emission Limitation**
500.0 lbs OC/month and 3.0 tons OC/yr from cleanup operations

Applicable Compliance Method

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

- c. **Emission Limitation**
1.0 lb VHAP/lb solids, as applied for stains

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

Emissions Unit ID: R600

- 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 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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PTI A

Emissions Unit ID: R600

Issued: To be entered upon final issuance**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>
R600 - Front/Back Stain Booth	OAC rule 3745-31-05	

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Saude

PTI A

Emissions Unit ID: R604

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R604 - Spray Unit for the Moulding Finishing Line - Modification to PTI #03-7194 (issued 2-2-94)	OAC 3745-31-05(A)(3)	0.02 lb organic compounds (OC)/hr, and 0.1 ton OC/yr from coating operations
		200.0 lbs OC/mo., 1.0 tons/yr OC from cleanup materials
	OAC rule 3745-21-07(G)(2)	See A.II.2.
	OAC rule 3745-17-11(B)	See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	40 CFR Part 63.802(b)(1)	1.0 lb volatile hazardous air pollutants (VHAP)/lb solids for topcoats
40 CFR Part 63.803	Work practice standards, See A.II.1	

2. Additional Terms and Conditions

- 2.a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11 (A) (2) (ii), this unit is exempt from the requirements of OAC rule 3745-17-11 (B) (2).
- 2.b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07 (A) (3) (h) because OAC

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rule 3745-17-11 is not applicable.

- 2.c. The requirements of the rule also include compliance with the requirements of OAC rule 3745-31-05 (D).

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.
2. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee maintain documentation of the following information :
 - a. the company identification for each coating and cleanup material employed;
 - b. documentation of whether of not each coating and cleanup material employed is a photochemically reactive material.
2. The permittee shall collect and record the following information each month for cleanup material usage in this emissions unit:
 - a. the company identification of each cleanup material employed;
 - b. the number of gallons of each cleanup material employed;
 - c. the organic compound content, in pounds per gallon, for each cleanup material employed;
 - d. the organic compound emission rate for each cleanup material employed, in lbs/month © x d);
 - e. the total organic compound emission rate for all cleanup materials employed [sum of (e)]; and
 - f. 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).

Sauder Woodworking Company

PTI Application: 02-12511

Issued

Facility ID: 0326000160

Emissions Unit ID: R604

3. 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.

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IV. Reporting Requirements

1. 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.
2. The permittee shall submit annual written reports of any deviations (excursions) from the annual organic compound emission limitations listed 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.
3. 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.

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**
0.02 lb OC/hour and 0.1 ton OC/yr from coating operations

Applicable Compliance Method

The hourly and annual OC emission limitation is based on the emission units potential to emit*. Therefore, no hourly recordkeeping, 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 0.02 pounds per gallon, a maximum hourly usage rate of 0.833 gallons per hour, and an

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operating schedule of 8760 hours per year.

- b. **Emission Limitation**
200.0 lbs OC/month and 1.0 tons OC/yr from cleanup operations

Applicable Compliance Method

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

- c. **Emission Limitation**
1.0 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.3. 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.

Emissions Unit ID: R604

- 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 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

Sauder Woodworking Company

PTI Application: 03 12511

Issued

Facility ID: 0326000160

Emissions Unit ID: R604

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>
R604 - Spray Unit for Mold Finishing Line	OAC rule 3745-31-05	

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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PTI A

Emissions Unit ID: R605

Issued: To be entered upon final issuance**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
R605 - Stain Spray Unit for the Moulding Finishing Line - Modification to PTI #03-7194 (issued 2-2-94)	OAC 3745-31-05(A)(3)	4.61 lb organic compounds (OC)/hr, and 20.2 tons OC/yr from coating operations
		333.0 lbs OC/mo., 2.0 tons/yr OC from cleanup materials
	OAC rule 3745-21-07(G)(2)	See A.II.2.
	OAC rule 3745-17-11(B)	See A.I.2.a.
	OAC rule 3745-17-07(A)	See A.I.2.b.
	40 CFR Part 63.802(b)(1)	1.0 lb volatile hazardous air pollutants (VHAP)/lb solids for topcoats
40 CFR Part 63.803	Work practice standards, See A.II.1	

2. Additional Terms and Conditions

- 2.a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11 (A) (2) (ii), this unit is exempt from the requirements of OAC rule 3745-17-11 (B) (2).
- 2.b. This emissions unit is exempt from the visible particulate emission limitations specified in OAC rule 3745-17-07 (A) pursuant to OAC rule 3745-17-07 (A) (3) (h) because OAC

Issued: To be entered upon final issuance

rule 3745-17-11 is not applicable.

- 2.c. The requirements of the rule also include compliance with the requirements of OAC rule 3745-31-05 (D).

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.
2. The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for coating usage in this emissions unit on an "as applied" basis:
 - a. the company identification for each coating employed;
 - b. documentation of whether or not each coating employed is a photochemically reactive material;
 - c. the number of gallons of each coating employed;
 - d. the OC content, in pounds per gallon, for each coating employed;
 - e. the OC emission rate for each coating employed, in lbs/month © x d);
 - f. the total OC emission rate for all coatings employed [sum of (e) for coating materials];
 - g. the annual, year to date OC emissions from all coating materials employed (sum of (f) for each calendar month to date from January to December).
2. The permittee shall collect and record the following information each month for cleanup material usage in this emissions unit:
 - a. the company identification of each cleanup material employed;

Emissions Unit ID: R605

- 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).
3. 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 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.
2. The permittee shall submit annual written reports of any deviations (excursions) from the annual organic compound emission limitations listed 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.
3. 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

Issued: To be entered upon final issuance

through June and July through December.

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**

4.61 lbs OC/hour and 20.2 ton OC/yr from coating operations

Applicable Compliance Method

The hourly OC emission limitation is based on the emission units potential to emit*. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance. Compliance with the annual emission limitation shall be determined based upon the recordkeeping requirements specified in section A.III.1.

*The potential to emit for this emissions unit was based on a maximum VOC content of 7.37 pounds per gallon and a maximum hourly usage rate of 0.625 gallons per hour.

- b. **Emission Limitation**

333.0 lbs OC/month and 2.0 tons OC/yr from cleanup operations

Applicable Compliance Method

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

- c. **Emission Limitation**

1.0 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.3. 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

Emissions Unit ID: R605

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 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

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Emissions Unit ID: R605

Issued: To be entered upon final issuance

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>
R605 - Stain Spray Unit for the Mold Finish Line	OAC rule 3745-31-05	

2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None