



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

11/5/2012

Mr. Kim Root  
N. Wasserstrom & Sons/ Amtekco Industries Inc.  
2300 Lockbourne Road  
Columbus, OH 43207

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0125043113  
Permit Number: P0108303  
Permit Type: Initial Installation  
County: Franklin

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Columbus Dispatch. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall  
Permit Review/Development Section  
Ohio EPA, DAPC  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

*Michael W. Ahern*  
Michael W. Ahern, Manager  
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 -Via E-Mail Notification  
Ohio EPA-CDO

Certified Mail

Yes	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

The Wasserstrom Company is a foodservice supplies and equipment manufacturer and distributor. The facility is comprised of N. Wasserstrom and Sons (NWS) and Amtekco Industries (AMT). NWS has been operating a spray booth since 2002 and adhesive stations since 2005. The emissions units have never had a permit. The facility is located at 2300 Lockbourne Road, Columbus, Ohio, 43207.

3. Facility Emissions and Attainment Status:

NWS/AMT potential emissions are 30.43 tons/yr of PE, 218.08 tons/yr of VOC, 47.81 tons/yr of individual HAP and 58.15 tons/yr of combined HAP. NWS/AMT is considered a major source under the metal furniture MACT (40 CFR 63.4880-4980 -- Subpart RRRR) and the wood furniture manufacturing MACT (40 CFR 63.800-819 – Subpart JJ). The facility is over Title V and NSR major source permitting thresholds for VOC; the facility has requested federally enforceable restrictions to avoid Title V for VOC and non-attainment NSR. The sources in this initial installation permit have VOC potential to emit of 59.84 tons per year, under major permitting thresholds and therefore not subject to a BACT analysis per the “Guidance on the Appropriate Injunctive Relief for Violations of Major New Source Review Requirements.”

Franklin County is marginal nonattainment for ozone (VOCs) and annual  $PM_{2.5}$ .

4. Source Emissions:

Source emissions are VOC, HAP and PE. The single highest HAP is toluene. The sources are subject to OAC 3745-31-05(A)(3), OAC 3745-31-05(D), OAC 3745-17-07(A) and (B) and OAC 3745-21-09(U). K003 was installed in 2001 and K004 was installed in 2005. Both installations occurred before 2006 and are therefore subject to case-by-case BAT per the December 10, 2009, BAT memo. The adhesive stations are exempt from OAC 3745-17-11(C) as the facility will not use more than 5 gallons of coating in any station on any day. Recordkeeping will support the continued exemption under OAC 3745-17-11(A)(1)(i).

As the emission units are subject to MACTs, the Air Toxics Policy does not apply per ORC 3704.03(F)(4)(e).

### Spray booth (K003)

The facility has requested federally enforceable restrictions on coating usage to limit VOC and HAP emissions. The facility is requesting a total usage limitation of 2,794 gallons/year (2,082 gallons of coating per year and 712 gallons of cleanup per year).

VOC

$E = \text{Coating usage (gallons/yr)} \times \text{coating VOC density (lb/gal)} \times 1 \text{ ton}/2000 \text{ lbs}$

$E = 2,082 \text{ gallons of coating/year} \times 6.72 \text{ lb VOC/gal} \times 1 \text{ ton}/2000 \text{ lbs}$

$E = 7.00 \text{ tons of VOCs from coatings per year}$



$E = 712 \text{ gallons of cleanup/year} \times 7.09 \text{ lb VOC/gal} \times 1 \text{ ton}/2000 \text{ lbs}$   
 $E = 2.52 \text{ tons VOCs from cleanup per year}$

Total VOC emissions will be 9.52 tons per year

Hourly emissions are determined based upon hourly potential to emit. Application rate is application area/production coverage rate and maximum process throughput is 6.86 pieces/hr.

Max Coating Usage = Maximum process throughput  $\times$  application rate  
Max Coating Usage =  $6.86 \text{ piece/hr} \times 0.053 \text{ gal of coating/piece}$   
Max Coating Usage =  $0.37 \text{ gal coating/hr}$

$E = \text{coating usage} \times \text{max VOC content}$   
 $E = 0.37 \text{ gal/hr} \times 6.72 \text{ lb VOC/gal}$   
 $E = 2.49 \text{ lb/hr}$

The maximum cleanup usage is 0.13 gal/hr. Emissions from cleanup are:  
 $E = 0.13 \text{ gal/hr} \times 7.09 \text{ lb VOC/gal}$   
 $E = 0.92 \text{ lb/hr}$

Add the two together and potential hourly emissions are 3.41 lb VOC/hr.

#### *Individual HAP*

The voluntary coating restriction also limits individual and combined HAP. The highest HAP in both coatings and cleanup materials is toluene.

$E = 2,082 \text{ gal coating/yr} \times 2.77 \text{ lb toluene/gal} \times 1 \text{ ton}/2000 \text{ lbs}$   
 $E = 2.88 \text{ ton/yr}$

$E = 712 \text{ gal cleanup/yr} \times 4.69 \text{ lb toluene/gal} \times 1 \text{ ton}/2000 \text{ lbs}$   
 $E = 1.67 \text{ ton/yr}$

Maximum annual toluene (individual HAP) emissions are 4.55 ton/yr

Hourly individual HAP emissions  
 $E = 0.37 \text{ gal coating/hr} \times 2.77 \text{ lb toluene/gal}$   
 $E = 1.02 \text{ lb toluene/hr}$

The highest HAP in cleanup is also toluene.  
 $E = 0.13 \text{ gal cleanup/hr} \times 4.69 \text{ lb toluene/gal}$   
 $E = 0.61 \text{ lb toluene/hr}$

Total hourly toluene emissions are 1.63 lb toluene/hr.

#### *Combined HAP*

The federally enforceable coating restriction also limits individual and combined HAP.

$E = 2,082 \text{ gal coating/yr} \times 3.94 \text{ lb/gal} \times 1 \text{ ton}/2000 \text{ lbs}$   
 $E = 4.10 \text{ ton/yr}$

$E = 712 \text{ gal cleanup/yr} \times 5.40 \text{ lb/gal} \times 1 \text{ ton}/2000 \text{ lbs}$   
 $E = 1.92 \text{ ton/yr}$



Maximum annual combined HAP emissions are 6.02 ton/yr

Hourly combined HAP emissions

$$E = 0.37 \text{ gal coating/hr} \times 3.94 \text{ lb HAP/gal}$$

$$E = 1.46 \text{ lb HAP/hr}$$

The hourly HAP emissions from cleanup.

$$E = 0.13 \text{ gal cleanup/hr} \times 5.40 \text{ lb HAP/gal}$$

$$E = 0.70 \text{ lb/hr}$$

Combined HAP emissions are 2.16 lb/hr.

*PE*

The coating operation has a 65% transfer efficiency (transfer efficiency from the California Air Resources Board information)

$E = \text{Max coating usage} \times \text{max solids content} \times \text{transfer efficiency}$

$$E = 0.37 \text{ gal coating/hr} \times 12.42 \text{ lb PE/gal} \times (1-65\%)$$

$$E = 1.61 \text{ lb PE/hr}$$

$$E = 1.61 \text{ lb PE/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton}/2000 \text{ lbs}$$

$$E = 7.05 \text{ ton PE/yr}$$

The spray booth has a control efficiency of 88%. Including the efficiency of the equipment, emissions are:

$E = \text{Coating usage (lb/hr)} \times (1 - \text{control efficiency})$

$$E = 1.61 \text{ lb PE/hr} \times (1 - 88\%)$$

$$E = 0.19 \text{ lb/hr}$$

$$E = 7.05 \text{ ton PE/yr} \times (1 - 88\%)$$

$$E = 0.85 \text{ ton/yr}$$

There are no solids in the cleanup material, based upon the information provided by the permittee.

#### **Adhesive Stations (K004 – K010)**

The facility has requested federally enforceable restrictions on coating usage to avoid Title V. The facility is requesting a total usage limitation of 881 gallons/year (785 gallons of coating per year and 96 gallons of cleanup per year).

VOC

$E = \text{Adhesive usage (gallons/yr)} \times \text{adhesive VOC density (lb/gal)} \times 1 \text{ ton}/2000 \text{ lbs}$

$$E = 785 \text{ gallons of coating/year} \times 5.01 \text{ lb VOC/gal} \times 1 \text{ ton}/2000 \text{ lbs}$$

$$E = 1.97 \text{ tons of VOCs from coatings per year}$$

$$E = 96 \text{ gallons of cleanup/year} \times 6.12 \text{ lb VOC/gal} \times 1 \text{ ton}/2000 \text{ lbs}$$

$$E = 0.29 \text{ tons VOCs from cleanup per year}$$



Total VOC emissions will be 2.26 tons per year

Hourly emissions are determined based upon hourly potential to emit. Application rate is application area/production coverage rate and maximum process throughput is 4 pieces/hr.

Max Coating Usage = Maximum process throughput x application rate  
Max Coating Usage = 4 piece/hr x 0.064 gal of coating/piece  
Max Coating Usage = 0.26 gal coating/hr

E = coating usage x max VOC content  
E = 0.26 gal/hr x 5.01 lb VOC/gal  
E = 1.30 lb/hr

The maximum cleanup usage is 0.03 gal/hr. Emissions from cleanup are:  
E = 0.03 gal/hr x 6.12 lb VOC/gal  
E = 0.18 lb/hr

Hourly potential emissions are 1.48 lb VOC.

#### *Individual HAP*

The voluntary coating restriction also limits individual and combined HAP. The highest HAP in both coatings and cleanup materials is toluene.

E = 786 gal coating/yr x 0.76 lb toluene/gal x 1 ton/2000 lbs  
E = 0.30 ton/yr

E = 96 gal cleanup/yr x 2.45 lb toluene/gal x 1 ton/2000 lbs  
E = 0.12 ton/yr

Maximum annual toluene (individual HAP) emissions are 0.42 ton/yr

Hourly individual HAP emissions  
E = 0.26 gal coating/hr x 0.76 lb toluene/gal  
E = 0.20 lb toluene/hr

The highest HAP in cleanup is also toluene.  
E = 0.03 gal cleanup/hr x 2.45 lb toluene/gal  
E = 0.07 lb toluene/hr

Total hourly toluene emissions are 0.27 lb toluene/hr.

#### *Combined HAP*

The voluntary coating restriction also limits individual and combined HAP.

E = 786 gal coating/yr x 0.95 lb/gal x 1 ton/2000 lbs  
E = 0.37 ton/yr

E = 96 gal cleanup/yr x 2.75 lb /gal x 1 ton/2000 lbs  
E = 0.13 ton/yr



Maximum annual combined HAP emissions are 0.50 ton/yr

Hourly combined HAP emissions

$$E = 0.26 \text{ gal coating/hr} \times 0.95 \text{ lb HAP/gal}$$

$$E = 0.25 \text{ lb HAP/hr}$$

The hourly HAP emissions from cleanup.

$$E = 0.03 \text{ gal cleanup/hr} \times 2.75 \text{ lb HAP/gal}$$

$$E = 0.08 \text{ lb toluene/hr}$$

Combined HAP emissions are 0.33 lb/hr.

PE

E = Max coating usage x max solids content x transfer efficiency

$$E = 0.26 \text{ gal coating/hr} \times 1.188 \text{ lb PE/gal} \times (1-65\%)$$

$$E = 0.11 \text{ lb PE/hr}$$

The facility is requesting a voluntary restriction to 785 gal/yr of coating.

$$E = 785 \text{ gal/yr} \times 1.188 \text{ lb PE/gal} \times 1 \text{ ton}/2000 \text{ lbs} \times (1-65\%)$$

$$E = 0.16 \text{ ton PE/yr}$$

The emission unit is exempt from the requirements of OAC rule 3745-17-11(C) because of OAC Rule 3745-17-11(A)(1)(i).

There are no solids in the cleanup material, based upon the information provided by the permittee.

5. Conclusion:

Permit monitoring and recordkeeping, while maintaining compliance with other terms and conditions in the permit, should ensure compliance with applicable state and federal rules.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>PE</u>	<u>1.0</u>
<u>VOC</u>	<u>25.33</u>
<u>iHAP</u>	<u>7.45</u>
<u>tHAP</u>	<u>9.55</u>



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install  
N. Wasserstrom & Sons/ Amtekco Industries Inc.

Issue Date: 11/5/2012  
Permit Number: P0108303  
Permit Type: Initial Installation  
Permit Description: Installation and operation of adhesive stations and a spray coating booth  
Facility ID: 0125043113  
Facility Location: N. Wasserstrom & Sons/ Amtekco Industries Inc.  
1205 Refugee Road,  
Columbus, OH 43207  
Facility Description: Institutional Furniture Manufacturing, Showcase, Partition, Shelving, and Locker Manufacturing

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Barbara Walker at Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049 or (614)728-3778. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install**

for

**N. Wasserstrom & Sons/ Amtekco Industries Inc.**

Facility ID:	0125043113
Permit Number:	P0108303
Permit Type:	Initial Installation
Issued:	11/5/2012
Effective:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
N. Wasserstrom & Sons/ Amtekco Industries Inc.

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**Draft Permit-to-Install**  
N. Wasserstrom & Sons/ Amtekco Industries Inc.  
**Permit Number:** P0108303  
**Facility ID:** 0125043113  
**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0125043113  
Facility Description: Restaurant furniture manufacturing  
Application Number(s): A0041924, A0045503  
Permit Number: P0108303  
Permit Description: Installation and operation of adhesive stations and a spray coating booth  
Permit Type: Initial Installation  
Permit Fee: \$3,200.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 11/5/2012  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

N. Wasserstrom & Sons/ Amtekco Industries Inc.  
1205 Refugee Road  
Columbus, OH 43207

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office  
50 West Town Street, 6th Floor  
P.O. Box 1049  
Columbus, OH 43216-1049  
(614)728-3778

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 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

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0108303

Permit Description: Installation and operation of adhesive stations and a spray coating booth

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>K003</b>
Company Equipment ID:	K003- Coating application booth 02
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

**Group Name: NWS adhesive stations**

<b>Emissions Unit ID:</b>	<b>K004</b>
Company Equipment ID:	K004-Furniture adhesive application
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K005</b>
Company Equipment ID:	Furniture adhesive application NWS station 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K006</b>
Company Equipment ID:	Furniture adhesive application NWS station 3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K007</b>
Company Equipment ID:	Furniture adhesive application NWS station 4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K008</b>
Company Equipment ID:	Furniture adhesive application NWS station 5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K009</b>
Company Equipment ID:	Furniture adhesive application NWS station 6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K010</b>
Company Equipment ID:	Furniture adhesive application NWS station 7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install**  
N. Wasserstrom & Sons/ Amtekco Industries Inc.  
**Permit Number:** P0108303  
**Facility ID:** 0125043113  
**Effective Date:** To be entered upon final issuance

## **A. Standard Terms and Conditions**



## **1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. 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.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) 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:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.



- (2) 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 Ohio EPA DAPC, Central District Office. 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 A.15. below if no deviations occurred during the quarter.
  - (3) 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 Ohio EPA DAPC, Central District Office 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.
  - (4) This permit is for an emissions unit located at a Title V facility. 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.

## 5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office 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).

## 6. Compliance Requirements

- a) 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.
- b) 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.



- c) 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:
  - (1) 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.
  - (2) 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.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) 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.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office 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:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) 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.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. 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.

## **9. 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 Ohio EPA DAPC, Central District Office.
- 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 Ohio EPA DAPC, Central District Office. 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.)

## **10. 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).

## **11. Construction of New Sources(s) and Authorization to Install**

- a) 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.
- b) If applicable, authorization to install any new 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 has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

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).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. 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.



**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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.

**16. 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.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. 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.

**19. 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.



**Draft Permit-to-Install**  
N. Wasserstrom & Sons/ Amtekco Industries Inc.  
**Permit Number:** P0108303  
**Facility ID:** 0125043113  
**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



**Draft Permit-to-Install**  
N. Wasserstrom & Sons/ Amtekco Industries Inc.  
**Permit Number:** P0108303  
**Facility ID:** 0125043113  
**Effective Date:** To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.



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## **C. Emissions Unit Terms and Conditions**



**1. K003, K003- Coating application booth 02**

**Operations, Property and/or Equipment Description:**

N. Wasserstrom JBI Spray Booth (Model 108-158)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Synthetic Minor to Avoid Title V and Prevention of Significant Deterioration and Non-attainment New Source Review)	Volatile organic compound (VOC) emissions shall not exceed 9.52 tons per rolling, 12-month period
b.	40 CFR Part 63, Subpart JJ (40 CFR 63.800-819)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart JJ (Wood Furniture Manufacturing Operations), in accordance with 40 CFR 63.802 for an existing affected source.</p> <p>Should Subpart JJ be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.</p> <p>See c)(3), d)(7), e)(3)</p>
c.	40 CFR Part 63, Subpart RRRR (40 CFR 63.4880 – 4981)	<p>The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart RRRR (Coating of Metal Furniture), in accordance with 40 CFR 63.4890 for an existing affected source.</p> <p>Should Subpart RRRR be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See c)(4), d)(8), e)(4)
d.	40 CFR Part 63, Subpart A (40 CFR 63.1-16)	See b)(2)b., c)(5), d)(9), e)(5)
e.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.19 pound per hour and 0.85 ton per year.
f.	OAC rule 3745-17-11(C)	See c)(1), c)(2), d)(2) – d)(6)
g.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)c.

(2) Additional Terms and Conditions

- a. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit. The maximum annual coating usage for this emissions unit shall not exceed:
  - i. 2,082 gallons of coating per rolling, 12-month period; and
  - ii. 712 gallons of cleanup material per rolling, 12-month period.
- b. Table 1 to Subpart JJ of 40 CFR Part 63 - "General Provisions Applicability to Subpart JJ of Part 63" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.
- c. The permittee shall not employ more than ten gallons of coating per day for the miscellaneous metal parts and products coating line. The daily usage limitation for the coating line shall not include coatings applied to parts or products which are not metal.

c) Operational Restrictions

- (1) The permittee shall install and operate a dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

[OAC rule 3745-17-11(C)(1) and (2)(b)]

- (2) In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

[OAC rule 3745-17-11(C)(2)(e)]



- (3) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart JJ.

[40 CFR Part 63, Subpart JJ]

- (4) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart RRRR.

[40 CFR Part 63, Subpart RRRR]

- (5) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

[40 CFR Part 63, Subpart A]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect and record the following information for each month for this emissions unit:

- a. the name and identification number of each coating and cleanup material employed;
- b. the VOC content of each coating and cleanup material employed, in pounds per gallon;
- c. the number of gallons of each coating and cleanup material employed;
- d. the rolling, 12-month summation of the coating and cleanup material employed, in gallons; and
- e. the total monthly VOC emissions from coating and cleanup operations, in tons.

The coating usage and VOC emission records shall be maintained for a minimum of 3 years.

[OAC 3745-21-09(B)(3)(d)] and [for OAC 3745-21-09(U)(2)(e)(iii)]

- (2) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC 3745-17-11(C)(2)(a)]

- (3) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain



acopy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(c)]

- (4) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

[OAC rule 3745-17-11(C)(2)(c)]

- (5) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
  - a. the date of the inspection;
  - b. a description of each/any problem identified and the date it was corrected;
  - c. a description of any maintenance and repairs performed; and
  - d. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

[OAC rule 3745-17-11(C)(2)(d) and (f)]

- (6) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

[OAC rule 3745-17-11(C)(2)(e),(f) and (g) for OAC rule 3745-17-11(C)(1)]

- (7) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart JJ.

[40 CFR Part 63, Subpart JJ]

- (8) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart RRRR.

[40 CFR Part 63, Subpart RRRR]

- (9) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

[40 CFR Part 63, Subpart A]



e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedance of the rolling, 12-month summation of coating;
  - b. any exceedance of the rolling, 12-month summation of cleanup material;
  - c. any exceedance of b)(2)c.; and
  - d. any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the emissions unit(s) was/were in operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart JJ.  
[40 CFR Part 63, Subpart JJ]
- (4) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart RRRR.  
[40 CFR Part 63, Subpart RRRR]
- (5) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.  
[40 CFR Part 63, Subpart A]

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
9.52 ton/yr of volatile organic compounds (VOCs)



Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements as specified in d)(1) of this permit.

b. Emission Limitation:

0.19 lbs of particulate emissions (PE) per hour

Applicable Compliance Method:

Compliance with the hourly emission limitation shall be determined by multiplying the maximum hourly coating usage (0.37 gallons) by the maximum solids content in the coatings. Multiply the result by one minus the transfer efficiency (65%) and one minus the control efficiency (88%).

c. Emission Limitation:

0.85 ton of particulate emissions per year

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by multiplying the maximum hourly coating usage (0.37 gallons) by the maximum solids content in the coatings and a conversion factor of 8,760 hours/yr and 1 ton/2000 hr. Multiply the result by one minus the transfer efficiency (65%) and one minus the control efficiency (88%). Provided compliance with the hourly limitation is shown, compliance with the annual limitation will be assumed.

d. Emissions Limitation:

Use no more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(1)c.

- (2) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart JJ.

[40 CFR Part 63, Subpart JJ]

- (3) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart RRRR.

[40 CFR Part 63, Subpart RRRR]



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- (4) The permittee shall comply with the applicable testing requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

[40 CFR Part 63, Subpart A]

- g) Miscellaneous Requirements

- (1) None.



**2. Emissions Unit Group -NWS adhesive stations: K004,K005,K006,K007,K008,K009,K010,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
K004	NWS air spray gun for wood furniture adhesive application, station #1
K005	NWS air spray gun for wood furniture adhesive application, station #2
K006	NWS air spray gun for wood furniture adhesive application, station #3
K007	NWS air spray gun for wood furniture adhesive application, station #4
K008	NWS air spray gun for wood furniture adhesive application, station #5
K009	NWS air spray gun for wood furniture adhesive application, station #6
K010	NWS air spray gun for wood furniture adhesive application, station #7

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V)	Volatile organic compound (VOC) emissions shall not exceed 2.26 tons per rolling, 12-month period.  See b)(2)a.
b.	40 CFR Part 63, Subpart JJ (40 CFR 63.800-819)	The permittee shall comply with the applicable emission limitation(s) as specified in 40 CFR Part 63, Subpart JJ (Wood Furniture Manufacturing Operations), in accordance with 40 CFR 63.802 for an existing affected source.  Should Subpart JJ be revised during the term of this permit, the permittee shall comply with the applicable requirements of the most recent promulgation.  See c)(1), d)(3), e)(3)
c.	40 CFR Part 63, Subpart A (40 CFR 63.1-16)	See b)(2)b., c)(1), d)(3), e)(3)
d.	OAC rule 3745-31-05(A)(3)	Particulate emissions (PE) shall not exceed 0.11 pound per hour and 0.16 ton



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		per year.
e.	OAC rule 3745-17-11(C)	See b)(2)c.

(2) Additional Terms and Conditions

- a. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coating usage, upon issuance of this permit. The maximum annual coating usage for this emissions unit shall not exceed:
  - i. 785 gallons of coating per rolling, 12-month period; and
  - ii. 96 gallons of cleanup material per rolling, 12-month period.
- b. Table 1 to Subpart JJ of 40 CFR Part 63 - "General Provisions Applicability to Subpart JJ" identifies which parts of the General Provisions in 40 CFR Part 63.1-16 apply.
- c. This emissions unit is exempt from the requirements of OAC rule 3745-17-11(C) because of OAC rule 3745-17-11(A)(1)(i).
- d. The maximum daily coating usage for this emissions unit shall not exceed 5 gallons.

c) Operational Restrictions

- (1) The permittee shall comply with the applicable operational restrictions necessary to demonstrate compliance with 40 CFR Part 63, Subpart JJ.

[40 CFR Part 63, Subpart JJ]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain daily records of the coating usage in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information:
  - a. the name and identification number of each coating and cleanup material employed;
  - b. the VOC content of each coating and cleanup material employed, in pounds per gallon;
  - c. the number of gallons of each coating and cleanup material employed;
  - d. the rolling, 12-month summation of the coating and cleanup material employed, in gallons; and



- e. the total monthly VOC emissions from coating and cleanup operations, in tons.

The coating usage and VOC emission records shall be maintained for a minimum of 3 years.

- (3) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart JJ.

[40 CFR Part 63, Subpart JJ]

- (4) The permittee shall comply with the applicable monitoring and/or recordkeeping requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart A.

[40 CFR Part 63, Subpart A]

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. any exceedance of the daily coating usage limitation;
- b. any exceedance of the rolling, 12-month summation of coating; and
- c. any exceedance of the rolling, 12-month summation of cleanup material.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) The permittee shall comply with the applicable reporting requirements necessary to demonstrate compliance with 40 CFR Part 63, Subpart JJ.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:  
2.26 tons per rolling, 12-month period of volatile organic compounds (VOCs).

Applicable Compliance Method:

Compliance was established by adding the emissions from the coating and cleanup processes. The coating emissions were determined by taking the maximum coating usage per rolling, 12-month period (785 gallons) and multiplying it by the highest VOC content of the coatings. The result was then multiplied by a conversion factor of 1 ton/2,000 lbs.



The cleanup emissions were determined by taking the maximum cleanup usage per rolling, 12-month period (96 gallons) and multiplying it by the highest VOC content of the cleanup materials. The result was then multiplied by a conversion factor of 1 ton/2,000 lbs.

- b. Emission Limitation:  
0.11 lb/hr and 0.16 ton/yr of particulate emissions

Applicable Compliance Method:

The hourly emission limitation was developed by multiplying the maximum coating usage per hour by the solids weight percent of the coating. The resulting emission limitation was then multiplied by one minus a transfer efficiency of 65%.

The annual emission limitation was developed by multiplying the maximum coating usage per year by the solids weight percent of the coating. The resulting emission limitation was then multiplied by one minus a transfer efficiency of 65% and a conversion factor of 1 ton/2000 pounds.

- g) Miscellaneous Requirements
  - (1) None.