

Synthetic Minor Determination and/or Netting Determination

Permit To Install 03-13929

A. Source Description

Norwalk Furniture has proposed to install one new stain and varnish spray booth and to permit twelve existing polyurethane glue booths that previously qualified for the de minimis exemption. In addition, three existing stain and varnish spray booths will be modified so that federally enforceable limitations can be developed on a facility-wide basis.

B. Facility Emissions and Attainment Status

Norwalk Furniture is located in Huron County. Huron County is considered attainment for all criteria pollutants. The company is requesting federally enforceable limitations to avoid MACT and Title V permitting requirements.

C. Source Emissions

Norwalk Furniture has requested federally enforceable limitations to restrict the potential to emit of hazardous air pollutants (HAPs) from emissions units K001-K012 and R001-R004 to below 10 tons per year for an individual HAP and 25 tons per year for any combination of HAPs.

D. Conclusion

Restricting annual HAP emissions below the 10 and 25 tons per year thresholds will prevent the company from being subject to MACT and Title V permitting requirements. Recordkeeping and excursion reports will be required to ensure compliance.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL
HURON COUNTY
Application No: 03-13929**

CERTIFIED MAIL

DATE: 4/15/2003

Norwalk Furniture Corporation
John Francisco
100 Furniture Parkway
Norwalk, OH 448579500

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 **\$3200** 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

NWDO

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HURON COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 03-13929 FOR AN AIR CONTAMINANT SOURCE FOR
NORWALK FURNITURE CORPORATION**

On 4/15/2003 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Norwalk Furniture Corporation**, located at **100 Furniture Parkway, Norwalk, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-13929:

Modifications of three existing varnish spray booths and installation of one new varnish spray booth and 12 polyurethane glue spray booths.

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 03-13929

Application Number: 03-13929
APS Premise Number: 0339020083
Permit Fee: **To be entered upon final issuance**
Name of Facility: Norwalk Furniture Corporation
Person to Contact: John Francisco
Address: 100 Furniture Parkway
Norwalk, OH 448579500

Location of proposed air contaminant source(s) [emissions unit(s)]:
**100 Furniture Parkway
Norwalk, Ohio**

Description of proposed emissions unit(s):
Modifications of three existing varnish spray booths and installation of one new varnish spray booth and 12 polyurethane glue spray booths.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. 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 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 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. 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

Norwalk Furniture Corporation

Facility ID: 0339020083

PTI Application: 03-13929

Issued: To be entered upon final issuance

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.

10. 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.

11. 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 required for any emissions unit for which a Permit To Install is required.

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

14. 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.

15. 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.

B. 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	46.00

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
K001 - Polyurethane Glue Booth #1 with Dry Filtration	OAC rule 3745-31-05 (A)(3)	0.32 lb of organic compounds (OC)/hour; 1.40 tons of OC/year See A.2.b
	OAC rule 3745-21-07 (G)	None (See B.1)
	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001- K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined (See A.2.a)

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitations for the purpose of avoiding Title V and MACT permitting requirements:

Combined annual HAP emissions resulting from the use of coatings in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, R001, R002, R003, and R004 shall not exceed 10 tons per rolling 12-month period for any individual HAP and 25 tons per rolling 12-month period for any combination of HAPs. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	< 25.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling 12-month summation of the monthly HAP emission rates.

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

B. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the material after any in-plant reducing or thinning and prior to application.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification number of each adhesive employed;
 - b. the OC content of each adhesive, as applied, in pounds per gallon;
 - c. the number of gallons of each adhesive employed;
 - d. the OC emission rate for each adhesive (C.1.b x C.1.c);

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- e. the total OC emission rate for all adhesives (summation of C.1.d), in pounds or tons;
 - f. the annual year to date OC emissions from adhesive usage, in tons per year (summation of C.1.e for each calendar month to date from January to December).
2. The permittee shall collect and record the following information for HAP emissions each month:
- a. the company identification of each adhesive employed;
 - b. the amount of each individual HAP (lb/gallon) in each adhesive, as applied;
 - c. the number of gallons of each adhesive employed;
 - d. the emission rate for each individual HAP from each adhesive employed, $(C.2.b) \times (C.2.c)$ for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all adhesives employed (summation of C.2.d for each individual HAP), in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all adhesives employed (summation of C.2.e for all HAPs), in lbs/month;
 - g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and
 - h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of the monthly HAP emissions.

Note: The adhesive information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

3. The permittee shall collect and record the following information each month for this emissions unit:
- a. the company identification of each adhesive employed; and
 - b. documentation on whether or not each adhesive is a photochemically reactive material.

Emissions Unit ID: **K001**

4. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m3): 188.40

Maximum Hourly Emission Rate (lbs/hr): 35.84 (assume total emissions from all units are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3108.00

MAGLC (ug/m3): 4485.71

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
0.32 lb of OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission's unit's potential to emit*. Therefore, no hourly recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit for this emissions unit is based on a maximum OC content of 1.29 pounds per gallon and a maximum usage rate of 0.25 gallon per hour.

- b. Emission Limitation
1.40 tons of OC/year

Applicable Compliance Method

Compliance with the annual emission limitation shall be based upon the recordkeeping requirements specified in section C.1.

- c. Emission Limitation
Emissions of HAPs from emissions unit K001-K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined.

Applicable Compliance Method

Compliance with the above emission limitations shall be based upon recordkeeping requirements specified in section C.2.

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
K002 - Polyurethane Glue Booth #2 with Dry Filtration	OAC rule 3745-31-05 (A)(3)	0.32 lb of organic compounds (OC)/hour; 1.40 tons of OC/year See A.2.b
	OAC rule 3745-21-07 (G)	None (See B.1)
	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001- K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined (See A.2.a)

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitations for the purpose of avoiding Title V and MACT permitting requirements:

Combined annual HAP emissions resulting from the use of coatings in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, R001, R002, R003, and R004 shall not exceed 10 tons per rolling 12-month period for any individual HAP and 25 tons per rolling 12-month period for any combination of HAPs. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Norwalk Furniture Corporation
PTI A
Issued

Facility ID: 0339020083

Emissions Unit ID: K002

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	< 25.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling 12-month summation of the monthly HAP emission rates.

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

B. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the material after any in-plant reducing or thinning and prior to application.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification number of each adhesive employed;
 - b. the OC content of each adhesive, as applied, in pounds per gallon;
 - c. the number of gallons of each adhesive employed;
 - d. the OC emission rate for each adhesive (C.1.b x C.1.c);

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- e. the total OC emission rate for all adhesives (summation of C.1.d), in pounds or tons;
 - f. the annual year to date OC emissions from adhesive usage, in tons per year (summation of C.1.e for each calendar month to date from January to December).
2. The permittee shall collect and record the following information for HAP emissions each month:
- a. the company identification of each adhesive employed;
 - b. the amount of each individual HAP (lb/gallon) in each adhesive, as applied;
 - c. the number of gallons of each adhesive employed;
 - d. the emission rate for each individual HAP from each adhesive employed, $(C.2.b) \times (C.2.c)$ for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all adhesives employed (summation of C.2.d for each individual HAP), in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all adhesives employed (summation of C.2.e for all HAPs), in lbs/month;
 - g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and
 - h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of the monthly HAP emissions.

Note: The adhesive information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

3. The permittee shall collect and record the following information each month for this emissions unit:
- a. the company identification of each adhesive employed; and
 - b. documentation on whether or not each adhesive is a photochemically reactive material.

Norwæ

PTI A

Emissions Unit ID: **K002**

Issued: To be entered upon final issuance

4. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m3): 188.40

Maximum Hourly Emission Rate (lbs/hr): 35.84 (assume total emissions from all units are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3108.00

MAGLC (ug/m3): 4485.71

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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Emissions Unit ID: K002

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the

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change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation

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0.32 lb of OC/hour

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Applicable Compliance Method

The hourly OC emission limitation is based on the emission's unit's potential to emit*. Therefore, no hourly recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit for this emissions unit is based on a maximum OC content of 1.29 pounds per gallon and a maximum usage rate of 0.25 gallon per hour.

- b. Emission Limitation
1.40 tons of OC/year

Applicable Compliance Method

Compliance with the annual emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- c. Emission Limitation
Emissions of HAPs from emissions units K001-K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined.

Applicable Compliance Method

Compliance with the above emission limitations shall be based upon recordkeeping requirements specified in section C.2.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
K003 - Polyurethane Glue Booth #3 with Dry Filtration	OAC rule 3745-31-05 (A)(3)	0.32 lb of organic compounds (OC)/hour; 1.40 tons of OC/year See A.2.b
	OAC rule 3745-21-07 (G)	None (See B.1)
	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001- K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined (See A.2.a)

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitations for the purpose of avoiding Title V and MACT permitting requirements:

Combined annual HAP emissions resulting from the use of coatings in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, R001, R002, R003, and R004 shall not exceed 10 tons per rolling 12-month period for any individual HAP and 25 tons per rolling 12-month period for any combination of HAPs. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

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Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	< 25.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling 12-month summation of the monthly HAP emission rates.

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

B. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the material after any in-plant reducing or thinning and prior to application.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification number of each adhesive employed;
 - b. the OC content of each adhesive, as applied, in pounds per gallon;
 - c. the number of gallons of each adhesive employed;

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- d. the OC emission rate for each adhesive (C.1.b x C.1.c);
 - e. the total OC emission rate for all adhesives (summation of C.1.d), in pounds or tons;
 - f. the annual year to date OC emissions from adhesive usage, in tons per year (summation of C.1.e for each calendar month to date from January to December).
2. The permittee shall collect and record the following information for HAP emissions each month:
- a. the company identification of each adhesive employed;
 - b. the amount of each individual HAP (lb/gallon) in each adhesive, as applied;
 - c. the number of gallons of each adhesive employed;
 - d. the emission rate for each individual HAP from each adhesive employed, (C.2.b) x (C.2.c) for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all adhesives employed (summation of C.2.d for each individual HAP), in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all adhesives employed (summation of C.2.e for all HAPs), in lbs/month;
 - g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and
 - h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of the monthly HAP emissions.

Note: The adhesive information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

3. The permittee shall collect and record the following information each month for this emissions unit:
- a. the company identification of each adhesive employed; and
 - b. documentation on whether or not each adhesive is a photochemically reactive material.

4. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m3): 188.40

Maximum Hourly Emission Rate (lbs/hr): 35.84 (assume total emissions from all units are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3108.00

MAGLC (ug/m3): 4485.71

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased

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exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Northwest District Office in writing of any such monthly record showing the use of a photochemically reactive material. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
0.32 lb of OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission's unit's potential to emit*. Therefore, no hourly recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit for this emissions unit is based on a maximum OC content of 1.29 pounds per gallon and a maximum usage rate of 0.25 gallon per hour.

- b. Emission Limitation
1.40 tons of OC/year

Applicable Compliance Method

Compliance with the annual emission limitation shall be based upon record keeping requirements specified in section C.1.

- c. Emission Limitation
Emissions of HAPs from emissions unit K001-K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined.

Applicable Compliance Method

Compliance with the above emission limitations shall be based upon recordkeeping requirements specified in section C.2.

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
K004 - Polyurethane Glue Booth #4 with Dry Filtration	OAC rule 3745-31-05 (A)(3)	0.32 lb of organic compounds (OC)/hour; 1.40 tons of OC/year See A.2.b
	OAC rule 3745-21-07 (G)	None (See B.1)
	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001- K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined (See A.2.a)

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitations for the purpose of avoiding Title V and MACT permitting requirements:

Combined annual HAP emissions resulting from the use of coatings in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, R001, R002, R003, and R004 shall not exceed 10 tons per rolling 12-month period for any individual HAP and 25 tons per rolling 12-month period for any combination of HAPs. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

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Emissions Unit ID: **K004**

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	< 25.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling 12-month summation of the monthly HAP emission rates.

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

B. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the material after any in-plant reducing or thinning and prior to application.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification number of each adhesive employed;
 - b. the OC content of each adhesive, as applied, in pounds per gallon;
 - c. the number of gallons of each adhesive employed;

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- d. the OC emission rate for each adhesive (C.1.b x C.1.c);
 - e. the total OC emission rate for all adhesives (summation of C.1.d), in pounds or tons;
 - f. the annual year to date OC emissions from adhesive usage, in tons per year (summation of C.1.e for each calendar month to date from January to December).
2. The permittee shall collect and record the following information for HAP emissions each month:
- a. the company identification of each adhesive employed;
 - b. the amount of each individual HAP (lb/gallon) in each adhesive, as applied;
 - c. the number of gallons of each adhesive employed;
 - d. the emission rate for each individual HAP from each adhesive employed, (C.2.b) x (C.2.c) for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all adhesives employed (summation of C.2.d for each individual HAP), in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all adhesives employed (summation of C.2.e for all HAPs), in lbs/month;
 - g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and
 - h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of the monthly HAP emissions.

Note: The adhesive information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

3. The permittee shall collect and record the following information each month for this emissions unit:
- a. the company identification of each adhesive employed; and
 - b. documentation on whether or not each adhesive is a photochemically reactive material.

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Emissions Unit ID: **K004**

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4. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m³): 188.40

Maximum Hourly Emission Rate (lbs/hr): 35.84 (assume total emissions from all units are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3108.00

MAGLC (ug/m³): 4485.71

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a photochemically reactive material. This notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
0.32 lb of OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission's unit's potential to emit*. Therefore, no hourly recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit for this emissions unit is based on a maximum OC content of 1.29 pounds per gallon and a maximum usage rate of 0.25 gallon per hour.

- b. Emission Limitation
1.40 tons of OC/year

Applicable Compliance Method

Compliance with the annual emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- c. Emission Limitation
Emissions of HAPs from emissions unit K001-K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined.

Applicable Compliance Method

Compliance with the above emission limitations shall be based upon recordkeeping requirements specified in section C.2.

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
K005 - Polyurethane Glue Booth #5 with Dry Filtration	OAC rule 3745-31-05 (A)(3)	0.32 lb of organic compounds (OC)/hour; 1.40 tons of OC/year See A.2.b
	OAC rule 3745-21-07 (G)	None (See B.1)
	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001- K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined (See A.2.a)

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitations for the purpose of avoiding Title V and MACT permitting requirements:

Combined annual HAP emissions resulting from the use of coatings in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, R001, R002, R003, and R004 shall not exceed 10 tons per rolling 12-month period for any individual HAP and 25 tons per rolling 12-month period for any combination of HAPs. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

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Emissions Unit ID: **K005**

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	< 25.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling 12-month summation of the monthly HAP emission rates.

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

B. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the material after any in-plant reducing or thinning and prior to application.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification number of each adhesive employed;
 - b. the OC content of each adhesive, as applied, in pounds per gallon;
 - c. the number of gallons of each adhesive employed;

- d. the OC emission rate for each adhesive (C.1.b x C.1.c);
 - e. the total OC emission rate for all adhesives (summation of C.1.d), in pounds or tons;
 - f. the annual year to date OC emissions from adhesive usage, in tons per year (summation of C.1.e for each calendar month to date from January to December).
2. The permittee shall collect and record the following information for HAP emissions each month:
- a. the company identification of each adhesive employed;
 - b. the amount of each individual HAP (lb/gallon) in each adhesive, as applied;
 - c. the number of gallons of each adhesive employed;
 - d. the emission rate for each individual HAP from each adhesive employed, (C.2.b) x (C.2.c) for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all adhesives employed (summation of C.2.d for each individual HAP), in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all adhesives employed (summation of C.2.e for all HAPs), in lbs/month;
 - g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and
 - h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of the monthly HAP emissions.
- Note: The adhesive information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.
3. The permittee shall collect and record the following information each month for this emissions unit:
- a. the company identification of each adhesive employed; and
 - b. documentation on whether or not each adhesive is a photochemically reactive material.

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PTI A

Emissions Unit ID: **K005**

Issued: To be entered upon final issuance

4. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m³): 188.40

Maximum Hourly Emission Rate (lbs/hr): 35.84 (assume total emissions from all units are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3108.00

MAGLC (ug/m³): 4485.71

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased

exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a photochemically reactive material. This notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

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PTI A

Emissions Unit ID: **K005**

Issued: To be entered upon final issuance

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
0.32 lb of OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission's unit's potential to emit*. Therefore, no hourly recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit for this emissions unit is based on a maximum OC content of 1.29 pounds per gallon and a maximum usage rate of 0.25 gallon per hour.

- b. Emission Limitation
1.40 tons of OC/year

Applicable Compliance Method

Compliance with the annual emission limitation shall be based upon the record keeping requirements specified in section C.1.

- c. Emission Limitation
Emissions of HAPs from emissions units K001-K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined.

Applicable Compliance Method

Compliance with the above emission limitations shall be based upon recordkeeping requirements specified in section C.2.

F. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
K006 - Polyurethane Glue Booth #6 with Dry Filtration	OAC rule 3745-31-05 (A)(3)	0.32 lb of organic compounds (OC)/hour; 1.40 tons of OC/year See A.2.b
	OAC rule 3745-21-07 (G)	None (See B.1)
	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001- K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined (See A.2.a)

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitations for the purpose of avoiding Title V and MACT permitting requirements:

Combined annual HAP emissions resulting from the use of coatings in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, R001, R002, R003, and R004 shall not exceed 10 tons per rolling 12-month period for any individual HAP and 25 tons per rolling 12-month period for any combination of HAPs. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Norwalk Furniture Corporation
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Issued

Facility ID: 0339020083

Emissions Unit ID: K006

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PTI A

Emissions Unit ID: **K006**

Issued: To be entered upon final issuance

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	< 25.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling 12-month summation of the monthly HAP emission rates.

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

B. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the material after any in-plant reducing or thinning and prior to application.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification number of each adhesive employed;
 - b. the OC content of each adhesive, as applied, in pounds per gallon;
 - c. the number of gallons of each adhesive employed;

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- d. the OC emission rate for each adhesive (C.1.b x C.1.c);
 - e. the total OC emission rate for all adhesives (summation of C.1.d), in pounds or tons;
 - f. the annual year to date OC emissions from adhesive usage, in tons per year (summation of C.1.e for each calendar month to date from January to December).
2. The permittee shall collect and record the following information for HAP emissions each month:
- a. the company identification of each adhesive employed;
 - b. the amount of each individual HAP (lb/gallon) in each adhesive, as applied;
 - c. the number of gallons of each adhesive employed;
 - d. the emission rate for each individual HAP from each adhesive employed, (C.2.b) x (C.2.c) for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all adhesives employed (summation of C.2.d for each individual HAP), in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all adhesives employed (summation of C.2.e for all HAPs), in lbs/month;
 - g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and
 - h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of the monthly HAP emissions.

Note: The adhesive information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

3. The permittee shall collect and record the following information each month for this emissions unit:
- a. the company identification of each adhesive coating employed; and
 - b. documentation on whether or not each adhesive coating is a photochemically reactive

material.

4. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m3): 188.40

Maximum Hourly Emission Rate (lbs/hr): 35.84 (assume total emissions from all units are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3108.00

MAGLC (ug/m3): 4485.71

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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Emissions Unit ID: **K006**

Issued: To be entered upon final issuance

- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a photochemically reactive material. This notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
0.32 lb of OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission's unit's potential to emit*. Therefore, no hourly recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit for this emissions unit is based on a maximum OC content of 1.29 pounds per gallon and a maximum usage rate of 0.25 gallon per hour.

- b. Emission Limitation
1.40 tons of OC/year

Applicable Compliance Method

Compliance with the annual emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- c. Emission Limitation
Emissions of HAPs from emissions unit K001-K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined.

Applicable Compliance Method

Compliance with the above emission limitations shall be based upon recordkeeping requirements specified in section C.2.

F. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
K007 - Polyurethane Glue Booth #7 with Dry Filtration	OAC rule 3745-31-05 (A)(3)	0.32 lb of organic compounds (OC)/hour; 1.40 tons of OC/year See A.2.b
	OAC rule 3745-21-07 (G)	None (See B.1)
	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001- K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined (See A.2.a)

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitations for the purpose of avoiding Title V and MACT permitting requirements:

Combined annual HAP emissions resulting from the use of coatings in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, R001, R002, R003, and R004 shall not exceed 10 tons per rolling 12-month period for any individual HAP and 25 tons per rolling 12-month period for any combination of HAPs. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

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Issued: To be entered upon final issuance

Emissions Unit ID: **K007**

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PTI A

Emissions Unit ID: **K007**

Issued: To be entered upon final issuance

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	< 25.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling 12-month summation of the monthly HAP emission rates.

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

B. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the material after any in-plant reducing or thinning and prior to application.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification number of each adhesive employed;
 - b. the OC content of each adhesive, as applied, in pounds per gallon;
 - c. the number of gallons of each adhesive employed;

- d. the OC emission rate for each adhesive (C.1.b x C.1.c);
 - e. the total OC emission rate for all adhesives (summation of C.1.d), in pounds or tons;
 - f. the annual year to date OC emissions from adhesive usage, in tons per year (summation of C.1.e for each calendar month to date from January to December).
2. The permittee shall collect and record the following information for HAP emissions each month:
- a. the company identification of each adhesive employed;
 - b. the amount of each individual HAP (lb/gallon) in each adhesive, as applied;
 - c. the number of gallons of each adhesive employed;
 - d. the emission rate for each individual HAP from each adhesive employed, (C.2.b) x (C.2.c) for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all adhesives employed (summation of C.2.d for each individual HAP), in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all adhesives employed (summation of C.2.e for all HAPs), in lbs/month;
 - g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and
 - h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of the monthly HAP emissions.
- Note: The adhesive information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.
3. The permittee shall collect and record the following information each month for this emissions unit:
- a. the company identification of each adhesive employed; and
 - b. documentation on whether or not each adhesive is a photochemically reactive material.

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Emissions Unit ID: **K007**

Issued: To be entered upon final issuance

4. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m³): 188.40

Maximum Hourly Emission Rate (lbs/hr): 35.84 (assume total emissions from all units are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3108.00

MAGLC (ug/m³): 4485.71

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased

exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a photochemically reactive material. This notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

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PTI A

Emissions Unit ID: **K007**

Issued: To be entered upon final issuance

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
0.32 lb of OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission's unit's potential to emit*. Therefore, no hourly recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit for this emissions unit is based on a maximum OC content of 1.29 pounds per gallon and a maximum usage rate of 0.25 gallon per hour.

- b. Emission Limitation
1.40 tons of OC/year

Applicable Compliance Method

Compliance with the annual emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- c. Emission Limitation
Emissions of HAPs from emissions unit K001-K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined.

Applicable Compliance Method

Compliance with the above emission limitations shall be based upon recordkeeping requirements specified in section C.2.

F. Miscellaneous Requirements

None

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
K008 - Polyurethane Glue Booth #8 with Dry Filtration	OAC rule 3745-31-05 (A)(3)	0.32 lb of organic compounds (OC)/hour; 1.40 tons of OC/year See A.2.b
	OAC rule 3745-21-07 (G)	None (See B.1)
	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001- K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined (See A.2.a)

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitations for the purpose of avoiding Title V and MACT permitting requirements:

Combined annual HAP emissions resulting from the use of coatings in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, R001, R002, R003, and R004 shall not exceed 10 tons per rolling 12-month period for any individual HAP and 25 tons per rolling 12-month period for any combination of HAPs. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Norwalk Furniture Corporation
PTI A
Issued

Facility ID: 0339020083

Emissions Unit ID: K008

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PTI A

Emissions Unit ID: **K008**

Issued: To be entered upon final issuance

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	< 25.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling 12-month summation of the monthly HAP emission rates.

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

B. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the material after any in-plant reducing or thinning and prior to application.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification number of each adhesive employed;
 - b. the OC content of each adhesive, as applied, in pounds per gallon;
 - c. the number of gallons of each adhesive employed;

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- d. the OC emission rate for each adhesive (C.1.b x C.1.c);
 - e. the total OC emission rate for all adhesives (summation of C.1.d), in pounds or tons;
 - f. the annual year to date OC emissions from adhesive usage, in tons per year (summation of C.1.e for each calendar month to date from January to December).
2. The permittee shall collect and record the following information for HAP emissions each month:
- a. the company identification of each adhesive employed;
 - b. the amount of each individual HAP (lb/gallon) in each adhesive, as applied;
 - c. the number of gallons of each adhesive employed;
 - d. the emission rate for each individual HAP from each adhesive employed, (C.2.b) x (C.2.c) for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all adhesives employed (summation of C.2.d for each individual HAP), in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all adhesives employed (summation of C.2.e for all HAPs), in lbs/month;
 - g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and
 - h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of the monthly HAP emissions.

Note: The adhesive information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

3. The permittee shall collect and record the following information each month for this emissions unit:
- a. the company identification of each adhesive employed; and
 - b. documentation on whether or not each adhesive is a photochemically reactive material.

4. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m3): 188.40

Maximum Hourly Emission Rate (lbs/hr): 35.84 (assume total emissions from all units are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3108.00

MAGLC (ug/m3): 4485.71

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased

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exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a photochemically reactive material. This notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
0.32 lb of OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission's unit's potential to emit*. Therefore, no hourly recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit for this emissions unit is based on a maximum OC content of 1.29 pounds per gallon and a maximum usage rate of 0.25 gallon per hour.

- b. Emission Limitation
1.40 tons of OC/year

Applicable Compliance Method

Compliance with the annual emission limitation shall be based upon record keeping requirements specified in section C.1.

- c. Emission Limitation
Emissions of HAPs from emissions unit K001-K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined.

Applicable Compliance Method

Compliance with the above emission limitations shall be based upon recordkeeping requirements specified in section C.2.

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
K009 - Polyurethane Glue Booth #9 with Dry Filtration	OAC rule 3745-31-05 (A)(3)	0.32 lb of organic compounds (OC)/hour; 1.40 tons of OC/year See A.2.b
	OAC rule 3745-21-07 (G)	None (See B.1)
	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001- K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined (See A.2.a)

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitations for the purpose of avoiding Title V and MACT permitting requirements:

Combined annual HAP emissions resulting from the use of coatings in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, R001, R002, R003, and R004 shall not exceed 10 tons per rolling 12-month period for any individual HAP and 25 tons per rolling 12-month period for any combination of HAPs. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

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Emissions Unit ID: **K009**

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Emissions Unit ID: **K009**

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Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	< 25.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling 12-month summation of the monthly HAP emission rates.

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

B. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the material after any in-plant reducing or thinning and prior to application.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification number of each adhesive employed;
 - b. the OC content of each adhesive, as applied, in pounds per gallon;
 - c. the number of gallons of each adhesive employed;

- d. the OC emission rate for each adhesive (C.1.b x C.1.c);
 - e. the total OC emission rate for all adhesives (summation of C.1.d), in pounds or tons;
 - f. the annual year to date OC emissions from adhesive usage, in tons per year (summation of C.1.e for each calendar month to date from January to December).
2. The permittee shall collect and record the following information for HAP emissions each month:
- a. the company identification of each adhesive employed;
 - b. the amount of each individual HAP (lb/gallon) in each adhesive, as applied;
 - c. the number of gallons of each adhesive employed;
 - d. the emission rate for each individual HAP from each adhesive employed, (C.2.b) x (C.2.c) for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all adhesives employed (summation of C.2.d for each individual HAP), in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all adhesives employed (summation of C.2.e for all HAPs), in lbs/month;
 - g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and
 - h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of the monthly HAP emissions.
- Note: The adhesive information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.
3. The permittee shall collect and record the following information each month for this emissions unit:
- a. the company identification of each adhesive employed; and
 - b. documentation on whether or not each adhesive is a photochemically reactive material.

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Emissions Unit ID: **K009**

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4. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m³): 188.40

Maximum Hourly Emission Rate (lbs/hr): 35.84 (assume total emissions from all units are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3108.00

MAGLC (ug/m³): 4485.71

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased

exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a photochemically reactive material. This notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

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Emissions Unit ID: **K009**

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1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
0.32 lb of OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission's unit's potential to emit*. Therefore, no hourly recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit for this emissions unit is based on a maximum OC content of 1.29 pounds per gallon and a maximum usage rate of 0.25 gallon per hour.

- b. Emission Limitation
1.40 tons of OC/year

Applicable Compliance Method

Compliance with the annual emission limitation shall be based upon record keeping requirements specified in section C.1.

- c. Emission Limitation
Emissions of HAPs from emissions unit K001-K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined.

Applicable Compliance Method

Compliance with the above emission limitations shall be based upon recordkeeping requirements in specified in section C.2.

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
K010 - Polyurethane Glue Booth #10 with Dry Filtration	OAC rule 3745-31-05 (A)(3)	0.32 lb of organic compounds (OC)/hour; 1.40 tons of OC/year See A.2.b
	OAC rule 3745-21-07 (G)	None (See B.1)
	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001- K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined (See A.2.a)

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitations for the purpose of avoiding Title V and MACT permitting requirements:

Combined annual HAP emissions resulting from the use of coatings in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, R001, R002, R003, and R004 shall not exceed 10 tons per rolling 12-month period for any individual HAP and 25 tons per rolling 12-month period for any combination of HAPs. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Norwalk Furniture Corporation
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Facility ID: 0339020083

Emissions Unit ID: K010

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Emissions Unit ID: **K010**

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	< 25.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling 12-month summation of the monthly HAP emission rates.

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

B. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the material after any in-plant reducing or thinning and prior to application.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification number of each adhesive employed;
 - b. the OC content of each adhesive, as applied, in pounds per gallon;
 - c. the number of gallons of each adhesive employed;

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- d. the OC emission rate for each adhesive (C.1.b x C.1.c);
 - e. the total OC emission rate for all adhesives (summation of C.1.d), in pounds or tons;
 - f. the annual year to date OC emissions from adhesive usage, in tons per year (summation of C.1.e for each calendar month to date from January to December).
2. The permittee shall collect and record the following information for HAP emissions each month:
- a. the company identification of each adhesive employed;
 - b. the amount of each individual HAP (lb/gallon) in each adhesive, as applied;
 - c. the number of gallons of each adhesive employed;
 - d. the emission rate for each individual HAP from each adhesive employed, (C.2.b) x (C.2.c) for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all adhesives employed (summation of C.2.d for each individual HAP), in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all adhesives employed (summation of C.2.e for all HAPs), in lbs/month;
 - g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and
 - h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of the monthly HAP emissions.

Note: The adhesive information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

3. The permittee shall collect and record the following information each month for this emissions unit:
- a. the company identification of each adhesive employed; and
 - b. documentation on whether or not each adhesive is a photochemically reactive material.

4. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m3): 188.40

Maximum Hourly Emission Rate (lbs/hr): 35.84 (assume total emissions from all units are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3108.00

MAGLC (ug/m3): 4485.71

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased

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Emissions Unit ID: **K010**

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exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a photochemically reactive material. This notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
0.32 lb of OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission's unit's potential to emit*. Therefore, no hourly recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit for this emissions unit is based on a maximum OC content of 1.29 pounds per gallon and a maximum usage rate of 0.25 gallon per hour.

- b. Emission Limitation
1.40 tons of OC/year

Applicable Compliance Method

Compliance with the annual emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- c. Emission Limitation
Emissions of HAPs from emissions unit K001-K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined.

Applicable Compliance Method

Compliance with the above emission limitations shall be based upon recordkeeping requirements specified in section C.2.

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
K011 - Polyurethane Glue Booth #11 with Dry Filtration	OAC rule 3745-31-05 (A)(3)	0.32 lb of organic compounds (OC)/hour; 1.40 tons of OC/year See A.2.b
	OAC rule 3745-21-07 (G)	None (See B.1)
	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001- K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined (See A.2.a)

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitations for the purpose of avoiding Title V and MACT permitting requirements:

Combined annual HAP emissions resulting from the use of coatings in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, R001, R002, R003, and R004 shall not exceed 10 tons per rolling 12-month period for any individual HAP and 25 tons per rolling 12-month period for any combination of HAPs. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified

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in the following table:

Emissions Unit ID: **K011**

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Emissions Unit ID: **K011**

Maximum Allowable Cumulative HAP Emission Rates (tons)

<u>Month(s)</u>	<u>Individual HAP</u>	<u>Combined HAPs</u>
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	< 25.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling 12-month summation of the monthly HAP emission rates.

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

B. Operational Restrictions

1. The permittee shall not employ any material in this emission unit that is a photochemically reactive material as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the material after any in-plant reducing or thinning and prior to application.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification number of each adhesive employed;
 - b. the OC content of each adhesive, as applied, in pounds per gallon;
 - c. the number of gallons of each adhesive employed;

- d. the OC emission rate for each adhesive (C.1.b x C.1.c);
 - e. the total OC emission rate for all adhesives (summation of C.1.d), in pounds or tons;
 - f. the annual year to date OC emissions from adhesive usage, in tons per year (summation of C.1.e for each calendar month to date from January to December).
2. The permittee shall collect and record the following information for HAP emissions each month:
- a. the company identification of each adhesive employed;
 - b. the amount of each individual HAP (lb/gallon) in each adhesive, as applied;
 - c. the number of gallons of each adhesive employed;
 - d. the emission rate for each individual HAP from each adhesive employed, (C.2.b) x (C.2.c) for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all adhesives employed (summation of C.2.d for each individual HAP), in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all adhesives employed (summation of C.2.e for all HAPs), in lbs/month;
 - g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and
 - h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of the monthly HAP emissions.
- Note: The adhesive information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.
3. The permittee shall collect and record the following information each month for this emissions unit:
- a. the company identification of each adhesive employed; and
 - b. documentation on whether or not each adhesive is a photochemically reactive material.

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Emissions Unit ID: **K011**

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4. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m³): 188.40

Maximum Hourly Emission Rate (lbs/hr): 35.84 (assume total emissions from all units are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3108.00

MAGLC (ug/m³): 4485.71

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
3. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a photochemically reactive material. This notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions

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Emissions Unit ID: **K011**

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shall be determined in accordance with the following methods:

- a. Emission Limitation
0.32 lb of OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission's unit's potential to emit*. Therefore, no hourly recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit for this emissions unit is based on a maximum OC content of 1.29 pounds per gallon and a maximum usage rate of 0.25 gallon per hour.

- b. Emission Limitation
1.40 tons of OC/year

Applicable Compliance Method

Compliance with the annual emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- c. Emission Limitation
Emissions of HAPs from emissions unit K001-K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined.

Applicable Compliance Method

Compliance with the above emission limitations shall be based upon recordkeeping requirements specified in section C.2.

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
K012 - Polyurethane Glue Booth #12 with Dry Filtration	OAC rule 3745-31-05 (A)(3)	0.32 lb of organic compounds (OC)/hour; 1.40 tons of OC/year See A.2.b
	OAC rule 3745-21-07 (G)	None (See B.1)
	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001- K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined (See A.2.a)

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitations for the purpose of avoiding Title V and MACT permitting requirements:

Combined annual HAP emissions resulting from the use of coatings in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, R001, R002, R003, and R004 shall not exceed 10 tons per rolling 12-month period for any individual HAP and 25 tons per rolling 12-month period for any combination of HAPs. To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	< 25.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling 12-month summation of the monthly HAP emission rates.

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

B. Operational Restrictions

1. The permittee shall not employ any material in this emissions unit that is a photochemically reactive material as defined by OAC rule 3745-21-01 (C)(5). This determination shall be made based on the actual formulation of the material after any in-plant reducing or thinning and prior to application.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating line:
 - a. the name and identification number of each adhesive employed;
 - b. the OC content of each adhesive, as applied, in pounds per gallon;
 - c. the number of gallons of each adhesive employed;
 - d. the OC emission rate for each adhesive (C.1.b x C.1.c);

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- e. the total OC emission rate for all adhesives (summation of C.1.d), in pounds or tons;
 - f. the annual year to date OC emissions from adhesive usage, in tons per year (summation of C.1.e for each calendar month to date from January to December).
2. The permittee shall collect and record the following information for HAP emissions each month:
- a. the company identification of each adhesive employed;
 - b. the amount of each individual HAP (lb/gallon) in each adhesive, as applied;
 - c. the number of gallons of each adhesive employed;
 - d. the emission rate for each individual HAP from each adhesive employed, (C.2.b) x (C.2.c) for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all adhesives employed (summation of C.2.d for each individual HAP), in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all adhesives employed (summation of C.2.e for all HAPs), in lbs/month;
 - g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and
 - h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of the monthly HAP emissions.

Note: The adhesive information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

3. The permittee shall collect and record the following information each month for this emissions unit:
- a. the company identification of each adhesive employed; and
 - b. documentation on whether or not each adhesive is a photochemically reactive material.

Emissions Unit ID: **K012**

4. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m3): 188.40

Maximum Hourly Emission Rate (lbs/hr): 35.84 (assume total emissions from all units are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3108.00

MAGLC (ug/m3): 4485.71

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

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Emissions Unit ID: **K012**

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If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

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- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
- 2. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.
- 3. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of a photochemically reactive material. This notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.

E. Testing Requirements

- 1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation
0.32 lb of OC/hour

Applicable Compliance Method

The hourly OC emission limitation is based on the emission's unit's potential to emit*. Therefore, no hourly recordkeeping, reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

* The potential to emit for this emissions unit is based on a maximum OC content of 1.29 pounds per gallon and a maximum usage rate of 0.25 gallon per hour.

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- b. Emission Limitation
1.40 tons of OC/year

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Emissions Unit ID: **K012**

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Applicable Compliance Method

Compliance with the annual emission limitation shall be based upon recordkeeping requirements specified in section C.1.

c. Emission Limitation

Emissions of HAPs from emissions unit K001-K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined.

Applicable Compliance Method

Compliance with the above emission limitations shall be based upon recordkeeping requirements specified in section C.2.

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R001 - Stain and Varnish Spray Booth #1 with Dry Filtration and a Drying Oven (Modification of existing registration status spray booth to increase emission limits)	OAC rule 3745-31-05 (A)(3)	7.30 tons of organic compounds (OC)/year See A.2.b
	OAC rule 3745-21-07 (G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day
	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001- K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined (See A.2.a)

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitations for the purpose of avoiding Title V and MACT permitting requirements:

Combined annual HAP emissions resulting from the use of coatings in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, R001, R002, R003, and R004 shall not exceed 10 tons per rolling 12-month period for any individual HAP and 25 tons per rolling 12-month period for any combination of HAPs.

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Emissions Unit ID: **R001**

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To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

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Emissions Unit ID: R001

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	< 25.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling 12-month summation of the monthly emission rates.

- 2.b** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D) and OAC rule 3745-21-07 (G)(2).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the organic compound content of each coating, as applied, in pounds per gallon;
 - d. the total organic compound emission rate for each coating employed, in pounds per day

(C.1.b x C.1.c);

- e. the total organic compound emission rate for all coatings employed, in pounds per day (summation of C.1.d);
- f. the total number of hours the emissions unit was in operation;
- g. the average hourly organic compound emission rate for all coatings, i.e., (C.1.d)/(C.1.e), in pounds per hour, average.
- h. in conjunction with the recordkeeping above, the permittee shall collect and record the following information each month:
 - i. the total organic compound emission rate for all coatings, in pounds per month;
 - ii. the annual year to date organic compound emissions, in tons (summation of C.1.h.i for each calendar month to date from January to December).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01 (C)(5).]

- 2. The permittee shall collect and record the following information for HAP emissions each month:
 - a. the company identification of each coating employed;
 - b. the amount of each individual HAP (lb/gallon) in each coating, as applied;
 - c. the number of gallons of each coating employed;
 - d. the emission rate for each individual HAP from each coating employed, (C.2.b) x (C.2.c) for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all coatings employed (summation of C.2.d for each individual HAP), in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all coatings employed (summation of C.2.e for all HAPs), in lbs/month;
 - g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and

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- h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.

Note: The coating information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

3. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m³): 188.40

Maximum Hourly Emission Rate (lbs/hr): 35.84 (assume total emissions from all units are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3108.00

MAGLC (ug/m³): 4485.71

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

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3. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
8.0 pounds of OC/hour

Applicable Compliance Method

Compliance with the hourly emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- b. Emission Limitation
40.0 pounds of OC/day

Applicable Compliance Method

Compliance with the daily emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- c. Emission Limitation
7.30 tons of OC/year

Applicable Compliance Method

Compliance with the annual emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- d. Emission Limitation
Emissions of HAPs from emissions unit K001-K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined.

Applicable Compliance Method

Compliance with the above emission limitations shall be based upon recordkeeping requirements specified in section C.2.

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Facility ID: 0339020083

Emissions Unit ID: **R001**

F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R002 - Stain and Varnish Spray Booth #2 with Dry Filtration and a Drying Oven (Modification of existing registration status spray booth to increase emission limits)	OAC rule 3745-31-05 (A)(3)	7.30 tons of organic compounds (OC)/year See A.2.b
	OAC rule 3745-21-07 (G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day
	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001- K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined (See A.2.a)

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitations for the purpose of avoiding Title V and MACT permitting requirements:

Combined annual HAP emissions resulting from the use of coatings in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, R001, R002, R003, and R004 shall not exceed 10 tons per rolling 12-month period for any individual HAP and 25 tons per rolling 12-month period for any combination of HAPs.

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Emissions Unit ID: **R002**

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To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

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Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	< 25.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling 12-month summation of the monthly emission rates.

- 2.b** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D) and OAC rule 3745-21-09 (U)(1)(c).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the organic compound content of each coating, as applied, in pounds per gallon;
 - d. the total organic compound emission rate for each coating employed, in pounds per day

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(C.1.b x C.1.c);

- e. the total organic compound emission rate for all coatings employed, in pounds per day (summation of C.1.d);
- f. the total number of hours the emissions unit was in operation;
- g. the average hourly organic compound emission rate for all coatings, i.e., (C.1.d)/(C.1.e), in pounds per hour, average.
- h. in conjunction with the recordkeeping above, the permittee shall collect and record the following information each month:
 - i. the total organic compound emission rate for all coatings, in pounds per month;
 - ii. the annual year to date organic compound emissions, in tons (summation of C.1.h.i for each calendar month to date from January to December).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01 (C)(5).]

- 2. The permittee shall collect and record the following information for HAP emissions each month:
 - a. the company identification of each coating employed;
 - b. the amount of each individual HAP (lb/gallon) in each coating, as applied;
 - c. the number of gallons of each coating employed;
 - d. the emission rate for each individual HAP from each coating employed, (C.2.b) x (C.2.c) for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all coatings employed (summation of C.2.d for each individual HAP), in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all coatings employed (summation of C.2.e for all HAPs), in lbs/month;
 - g. for the first 12 months of operation, the cumulative monthly emission rate of each

Emissions Unit ID: R002

individual HAP and all HAPs combined, in tons per month; and

- h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.

Note: The coating information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

3. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m³): 188.40

Maximum Hourly Emission Rate (lbs/hr): 35.84 (assume total emissions from all units are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3108.00

MAGLC (ug/m³): 4485.71

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

Norwalk Furniture Corporation
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Issued

Facility ID: 0339020083

Emissions Unit ID: R002

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

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3. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
8.0 pounds of OC/hour

Applicable Compliance Method

Compliance with the hourly emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- b. Emission Limitation
40.0 pounds of OC/day

Applicable Compliance Method

Compliance with the daily emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- c. Emission Limitation
7.30 tons of OC/year

Applicable Compliance Method

Compliance with the annual emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- d. Emission Limitation
Emissions of HAPs from emissions units K001-K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined.

Applicable Compliance Method

Compliance with the above emission limitations shall be based upon recordkeeping requirements specified in section C.2.

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F. Miscellaneous Requirements

None

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R003 - Stain and Varnish Spray Booth #3 with Dry Filtration and a Drying Oven (Modification of existing registration status spray booth to increase emission limits)	OAC rule 3745-31-05 (A)(3)	7.30 tons of organic compounds (OC)/year See A.2.b
	OAC rule 3745-21-07 (G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day
	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001- K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined (See A.2.a)

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitations for the purpose of avoiding Title V and MACT permitting requirements:

Combined annual HAP emissions resulting from the use of coatings in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, R001, R002, R003, and R004 shall not exceed 10 tons per rolling 12-month period for any individual HAP and 25 tons per rolling 12-month period for any combination of HAPs.

Norwalk Furniture Corporation
PTI A
Issued

Facility ID: 0339020083

Emissions Unit ID: **R003**

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	< 25.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling 12-month summation of the monthly emission rates.

- 2.b** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D) and OAC rule 3745-21-09 (U)(1)(c).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the organic compound content of each coating, as applied, in pounds per gallon;
 - d. the total organic compound emission rate for each coating employed, in pounds per day

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(C.1.b x C.1.c);

- e. the total organic compound emission rate for all coatings employed, in pounds per day (summation of C.1.d);
- f. the total number of hours the emissions unit was in operation;
- g. the average hourly organic compound emission rate for all coatings, i.e., (C.1.d)/(C.1.e), in pounds per hour, average.
- h. in conjunction with the recordkeeping above, the permittee shall collect and record the following information each month:
 - i. the total organic compound emission rate for all coatings, in pounds per month;
 - ii. the annual year to date organic compound emissions, in tons (summation of C.1.h.i for each calendar month to date from January to December).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01 (C)(5).]

- 2. The permittee shall collect and record the following information for HAP emissions each month:
 - a. the company identification of each coating employed;
 - b. the amount of each individual HAP (lb/gallon) in each coating, as applied;
 - c. the number of gallons of each coating employed;
 - d. the emission rate for each individual HAP from each coating employed, (C.2.b) x (C.2.c) for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all coatings employed (summation of C.2.d for each individual HAP), in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all coatings employed (summation of C.2.e for all HAPs), in lbs/month;
 - g. for the first 12 months of operation, the cumulative monthly emission rate of each

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individual HAP and all HAPs combined, in tons per month; and

- h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.

Note: The coating information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

3. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m³): 188.40

Maximum Hourly Emission Rate (lbs/hr): 35.84 (assume total emissions from all units are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 3108.00

MAGLC (ug/m³): 4485.71

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists

(ACGIH)," than the lowest TLV value previously modeled;

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

Norwalk Furniture Corporation
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Facility ID: 0339020083

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These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

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3. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
8.0 pounds of OC/hour

Applicable Compliance Method

Compliance with the hourly emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- b. Emission Limitation
40.0 pounds of OC/day

Applicable Compliance Method

Compliance with the daily emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- c. Emission Limitation
7.30 tons of OC/year

Applicable Compliance Method

Compliance with the annual emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- d. Emission Limitation
Emissions of HAPs from emissions units K001-K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined.

Applicable Compliance Method

Compliance with the above emission limitations shall be based upon recordkeeping requirements specified in section C.2.

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F. Miscellaneous Requirements

None

Emissions Unit ID: **R003**

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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>
R004 - Stain and Varnish Spray Booth #4 with Dry Filtration and a Drying Oven	OAC rule 3745-31-05 (A)(3)	7.30 tons of organic compounds (OC)/year See A.2.b
	OAC rule 3745-21-07 (G)(2)	OC emissions shall not exceed 8 pounds per hour and 40 pounds per day
	OAC rule 3745-31-05 (D)	Emissions of hazardous air pollutants (HAPs) from emissions units K001- K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined (See A.2.a)

2. Additional Terms and Conditions

- 2.a The permittee has requested the following federally enforceable limitations for the purpose of avoiding Title V and MACT permitting requirements:

Combined annual HAP emissions resulting from the use of coatings in emissions units K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, R001, R002, R003, and R004 shall not exceed 10 tons per rolling 12-month period for any individual HAP and 25 tons per rolling 12-month period for any combination of HAPs.

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Emissions Unit ID: **R004**

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To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the HAP emission rates specified in the following table:

Maximum Allowable Cumulative HAP Emission Rates (tons)

Month(s)	Individual HAP	Combined HAPs
1-1	2.00	5.00
1-2	2.73	6.80
1-3	3.46	8.60
1-4	4.19	10.40
1-5	4.92	12.20
1-6	5.65	14.00
1-7	6.38	15.80
1-8	7.11	17.60
1-9	7.84	19.40
1-10	8.57	21.20
1-11	9.30	23.00
1-12	<10.00	< 25.00

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual HAP limitations shall be based upon a rolling 12-month summation of the monthly emission rates.

- 2.b** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05 (D) and OAC rule 3745-21-09 (U)(1)(c).

B. Operational Restrictions

None

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating operation:
 - a. the company identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the organic compound content of each coating, as applied, in pounds per gallon;
 - d. the total organic compound emission rate for each coating employed, in pounds per day

(C.1.b x C.1.c);

- e. the total organic compound emission rate for all coatings employed, in pounds per day (summation of C.1.d);
- f. the total number of hours the emissions unit was in operation;
- g. the average hourly organic compound emission rate for all coatings, i.e., (C.1.d)/(C.1.e), in pounds per hour, average.
- h. in conjunction with the recordkeeping above, the permittee shall collect and record the following information each month:
 - i. the total organic compound emission rate for all coatings, in pounds per month;
 - ii. the annual year to date organic compound emissions, in tons (summation of C.1.h.i for each calendar month to date from January to December).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01 (C)(5).]

- 2. The permittee shall collect and record the following information for HAP emissions each month:
 - a. the company identification of each coating employed;
 - b. the amount of each individual HAP (lb/gallon) in each coating, as applied;
 - c. the number of gallons of each coating employed;
 - d. the emission rate for each individual HAP from each coating employed, (C.2.b) x (C.2.c) for each individual HAP, in lbs/month;
 - e. the total emission rate for each individual HAP from all coatings employed (summation of C.2.d for each individual HAP), in lbs/month;
 - f. the total HAP emission rate for all HAPs combined from all coatings employed (summation of C.2.e for all HAPs), in lbs/month;
 - g. for the first 12 months of operation, the cumulative monthly emission rate of each individual HAP and all HAPs combined, in tons per month; and

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- h. after the first 12 months of operation, the annual emissions of each individual HAP and all HAPs combined, based upon a rolling 12-month summation of emissions.

Note: The coating information required above must be recorded for the materials as applied, including any thinning solvents added at the emissions unit.

- 3. The Permit to Install for this emissions unit was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the Permit to Install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the Permit to Install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Toluene

TLV (mg/m3): 188.40

Maximum Hourly Emission Rate (lbs/hr): 35.84 (assume total emissions from all units are toluene)

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3108.00

MAGLC (ug/m3): 4485.71

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final Permit to Install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify any exceedances of the maximum emission limitations for each individual HAP and combination of HAPs, as specified in section A.2.a. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.
2. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. An identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
 - b. An identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

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These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

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3. The permittee shall submit annual deviation (excursion) reports which identify any exceedances of the annual OC emission limitations specified in section A.1. If no deviations occurred during a calendar year, the permittee shall submit an annual report which states that no deviations occurred. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation
8.0 pounds of OC/hour

Applicable Compliance Method

Compliance with the hourly emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- b. Emission Limitation
40.0 pounds of OC/day

Applicable Compliance Method

Compliance with the daily limitation shall be based upon recordkeeping requirements specified in section C.1.

- c. Emission Limitation
7.30 tons of OC/year

Applicable Compliance Method

Compliance with the annual emission limitation shall be based upon recordkeeping requirements specified in section C.1.

- d. Emission Limitation
Emissions of HAPs from emissions unit K001-K012 and R001-R004 shall not exceed 10 tons per year for any individual HAP and 25 tons per year for all HAPs combined.

Applicable Compliance Method

Compliance with the above emission limitations shall be based upon recordkeeping requirements specified in section C.2.

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F. Miscellaneous Requirements

None