



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
TUSCARAWAS COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 06-08162

Fac ID: 0679000308

DATE: 1/9/2007

Schlabach Finishing
Ed Schlabach
201 Chateau Circle
Dundee, OH 44624

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

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

CC: USEPA

SEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 1/9/2007
Effective Date: 1/9/2007**

FINAL PERMIT TO INSTALL 06-08162

Application Number: 06-08162
Facility ID: 0679000308
Permit Fee: **\$600**
Name of Facility: Schlabach Finishing
Person to Contact: Ed Schlabach
Address: 201 Chateau Circle
Dundee, OH 44624

Location of proposed air contaminant source(s) [emissions unit(s)]:
**8261 Winklepleck Road NW
Dundee, Ohio**

Description of proposed emissions unit(s):
Booth stack with exhaust fan and HVLP spray pump.

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

Laura Powell
Acting Director

Part I - GENERAL TERMS AND CONDITIONS

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

3. 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

Schlabach Finishing
PTI Application: 06-08162
Issued: 1/9/2007

Facility ID: 0679000308

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)

Schlabach Finishing
PTI Application: 06-08162
Issued: 1/9/2007

Facility ID: 0679000308

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

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

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.

Schlabach Finishing
 PTI Application: 06-08162
 Issued: 1/9/2007

Facility ID: 0679000308

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This 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 emissions unit(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	25.0

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.

Operations, Property, and/or Equipment - (R001) - Wood furniture coating booth number 1 vented through dry filters (administrative modification) This permit supersedes PTI # 06-07669, issued 11/16/04.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>For each day that photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are not employed, the organic compound (OC) emissions from coatings and clean up materials shall not exceed 12.7 pounds per hour, as calculated in C.3.f below.</p> <p>The OC emissions from all the coatings and cleanup materials for emissions unit R001 shall be less than 25.0 tons per year.</p> <p>The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2).</p>
OAC rule 3745-31-05(C) Synthetic minor to avoid Title V applicability.	The OC emissions from all the coatings and cleanup materials for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3) shall be less than 25.0 tons per year, as a rolling, 12-month summation, combined.
OAC rule 3745-21-07(G)(2)	See A.2.a. below.

2. Additional Terms and Conditions

- 2.a For each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the OC emissions from all coatings and from photochemically reactive cleanup materials shall not exceed 8 pounds per hour and 40 pounds per day. OC emissions from clean up material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

Issued: 1/9/2007

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
2. The weight of organic material in solvent evaporated (solvent usage), which is equivalent to OC emissions, shall not exceed 25.0 tons during any 12-month rolling period from emissions units R001, R002, R004, R005 and coating booth # 3, combined.

Compliance with this limitation shall be based upon a rolling, 12-month summation of facility-wide solvent usage, calculated monthly, using the following equation:

Solvent Usage = [Summation (pounds of coatings employed x solvent content of coatings in percent OC by weight) + (pounds of cleanup solvent employed) for all calendar months] x 1 ton per 2000 pounds

The permittee has sufficient monthly records of solvent usage and OC emissions to begin calculating the rolling, 12-month summations upon final issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup material are employed in this emissions unit:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the OC content of each coating and photochemically reactive cleanup material, in pounds OC per gallon;
 - d. the total emissions rate for all coatings and photochemically reactive cleanup materials, in pounds OC per day;

Emissions Unit ID: **R001**

- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[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).]

- 3. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup materials are not employed in this emissions unit:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content of each coating, in pounds per gallon;
 - d. the total OC emission rate for all coatings, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate for all coatings, i.e., (d)/(e), in pounds per hour.
- 4. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each cleanup material;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
 - c. the OC content of each non-photochemically cleanup material, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed minus the number of gallons of cleanup material recovered for disposal; and
 - e. the total OC emissions from all cleanup materials employed, in tons per month,

Issued: 1/9/2007

i.e., sum of (c) times (d).

[Note: Usage of photochemically reactive cleanup material shall be recorded daily according to C.1 above.]

5. The permittee shall calculate and record the actual OC emissions for each month, (i.e., sum of daily coating OC emissions for each month plus the monthly cleanup OC emissions) for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3) combined. The permittee shall also maintain monthly records of the rolling, 12-month summation of the OC emissions, calculated by adding the current month's OC emissions to the OC emissions for the preceding eleven calendar months.

D. Reporting Requirements

1. The permittee shall notify the Director in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southeast District Office (SEDO) within 30 days after the event occurs.
2. The permittee shall notify SEDO, in writing of any record showing:
 - a. for the days during which a photochemically reactive material was employed, each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such incidence;
 - b. for the days during which a photochemically reactive material was not employed, each day during which the average OC emissions from the coatings and cleanup materials exceeded 12.7 pounds per hour, and the actual average OC emissions for each such day; and
 - c. each 12-month period during which the OC emissions from the coatings and cleanup materials exceeded 25.0 tons for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3) combined, and the actual OC emissions for each such 12-month period.

The permittee shall identify the cause for the emission exceedance and any corrective action taken. The notification shall include a copy of such record and shall be sent to

Issued: 1/9/2007

SEDO within 30 days after the event occurs.

3. The permittee shall submit deviation (excursion) reports that identify any exceedance of the rolling, 12-month OC emission limitation.
4. The permittee shall submit a report to SEDO, by January 31 of each year, that includes the total annual OC emissions which were emitted during the previous calendar year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Emissions Unit ID: **R001**

- a. Emissions Limitation:
For each day that a photochemically reactive material is employed, the OC emissions from all coatings and from photochemically reactive cleanup materials shall not exceed 8 pounds per hour.
- Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.f. based upon the record keeping specified in Section C.2.
- b. Emissions Limitation:
For each day that a photochemically reactive material is employed, the OC emissions from all coatings and from photochemically reactive cleanup materials shall not exceed 40 pounds per day.
- Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.d. based upon the record keeping specified in Section C.2.
- c. Emissions Limitation:
For each day that photochemically reactive materials are not employed, the OC emissions from coatings and clean up materials shall not exceed 12.7 pounds per hour, as a daily average.
- Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.3.f. based on the record keeping specified in Section C.3.
- d. Emissions Limitation:
The OC emissions from all the coatings and cleanup materials for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3) shall be less than 25.0 tons per year, as a rolling, 12-month summation, combined.
- Applicable Compliance Method:
Compliance shall be determined by summing the value recorded in C.5, which is based on the record keeping as specified in Section C.2, C.3 and C.4, and corresponding values for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3).
2. Any determination of OC content, solids contents, or density of coating material shall be based on the coating materials as employed (as applied), including the addition of

Issued: 1/9/2007

any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by

Issued: 1/9/2007

an analysis of each coating, as applied, by Reference Method 24 or Method 24A. Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the OC content of coating materials by Reference Method 24 or an equivalent or alternative method.

F. Miscellaneous Requirements

1. Based on information provided by the permittee, the facility Potential to Emit (PTE) for Hazardous Air Pollutants (HAP) is below the major source thresholds of 10 tons per year or more of any single HAP and 25 tons per year or more of any combination of HAP based on the facility operations and the maximum HAP content of the coatings/inks used. If any changes in the operations and/or coating/ink formulations occur, the PTE calculation should be modified accordingly. Any increase in PTE above the major source thresholds would subject the source to any applicable Maximum Achievable Control Technology (MACT) and Title V requirements.

Issued: 1/9/2007

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.

Operations, Property, and/or Equipment - (R002) - Wood furniture coating booth number 2 vented through dry filters (administrative modification) This permit supersedes PTI # 06-07669, issued 11/16/04.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>For each day that photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are not employed, the organic compound (OC) emissions from coatings and clean up materials shall not exceed 9.5 pounds per hour, as calculated in C.3.f below.</p> <p>The OC emissions from all the coatings and cleanup materials for emissions unit R001 shall be less than 25.0 tons per year.</p> <p>The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2).</p>
OAC rule 3745-31-05(C) Synthetic minor to avoid Title V applicability.	The OC emissions from all the coatings and cleanup materials for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3) shall be less than 25.0 tons per year, as a rolling, 12-month summation, combined.
OAC rule 3745-21-07(G)(2)	See A.2.a. below.

2. Additional Terms and Conditions

- 2.a For each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the OC emissions from all coatings and from photochemically reactive cleanup materials shall not exceed 8 pounds per hour and 40 pounds per day. OC emissions from clean up material that is not a photochemically reactive material shall not be included in showing compliance

with this limit.

Issued: 1/9/2007

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
2. The weight of organic material in solvent evaporated (solvent usage), which is equivalent to OC emissions, shall not exceed 25.0 tons during any 12-month rolling period from emissions units R001, R002, R004, R005 and coating booth # 3, combined.

Compliance with this limitation shall be based upon a rolling, 12-month summation of facility-wide solvent usage, calculated monthly, using the following equation:

Solvent Usage = [Summation (pounds of coatings employed x solvent content of coatings in percent OC by weight) + (pounds of cleanup solvent employed) for all calendar months] x 1 ton per 2000 pounds

The permittee has sufficient monthly records of solvent usage and OC emissions to begin calculating the rolling, 12-month summations upon final issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup material are employed in this emissions unit:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the OC content of each coating and photochemically reactive cleanup material, in pounds OC per gallon;
 - d. the total emissions rate for all coatings and photochemically reactive cleanup materials, in pounds OC per day;

Issued: 1/9/2007

- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[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).]

- 3. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup materials are not employed in this emissions unit:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content of each coating, in pounds per gallon;
 - d. the total OC emission rate for all coatings, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate for all coatings, i.e., (d)/(e), in pounds per hour.
- 4. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each cleanup material;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
 - c. the OC content of each non-photochemically cleanup material, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed minus the number of gallons of cleanup material recovered for disposal; and

Emissions Unit ID: **R002**

- e. the total OC emissions from all cleanup materials employed, in tons per month, i.e., sum of (c) times (d).

[Note: Usage of photochemically reactive cleanup material shall be recorded daily according to C.1 above.]

5. The permittee shall calculate and record the actual OC emissions for each month, (i.e., sum of daily coating OC emissions for each month plus the monthly cleanup OC emissions) for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3) combined. The permittee shall also maintain monthly records of the rolling, 12-month summation of the OC emissions, calculated by adding the current month's OC emissions to the OC emissions for the preceding eleven calendar months.

D. Reporting Requirements

1. The permittee shall notify the Director in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southeast District Office (SEDO) within 30 days after the event occurs.
2. The permittee shall notify SEDO, in writing of any daily record showing:
 - a. for the days during which a photochemically reactive material was employed, each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such incidence;
 - b. for the days during which a photochemically reactive material was not employed, each day during which the average OC emissions from the coatings and cleanup materials exceeded 12.7 pounds per hour, and the actual average OC emissions for each such day; and
 - c. each 12-month period during which the OC emissions from the coatings and cleanup materials exceeded 25.0 tons for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3) combined, and the actual OC emissions for each such 12-month period.

The permittee shall identify the cause for the emission exceedance and any corrective action taken. The notification shall include a copy of such record and shall be sent to

Issued: 1/9/2007

SEDO within 30 days after the event occurs.

3. The permittee shall submit deviation (excursion) reports that identify any exceedance of the rolling, 12-month OC emission limitation.
4. The permittee shall submit a report to SEDO, by January 31 of each year, that includes the total annual OC emissions which were emitted during the previous calendar year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Issued: 1/9/2007

- a. Emissions Limitation:
For each day that a photochemically reactive material is employed, the OC emissions from all coatings and from photochemically reactive cleanup materials shall not exceed 8 pounds per hour.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.f. based upon the record keeping specified in Section C.2.

- b. Emissions Limitation:
For each day that a photochemically reactive material is employed, the OC emissions from all coatings and from photochemically reactive cleanup materials shall not exceed 40 pounds per day.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.d. based upon the record keeping specified in Section C.2.

- c. Emissions Limitation:
For each day that photochemically reactive materials are not employed, the OC emissions from coatings and clean up materials shall not exceed 9.5 pounds per hour, as a daily average.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.3.f. based on the record keeping specified in Section C.3.

- d. Emissions Limitation:
The OC emissions from all the coatings and cleanup materials for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3) shall be less than 25.0 tons per year, as a rolling, 12-month summation, combined.

Applicable Compliance Method:
Compliance shall be determined by summing the value recorded in C.5, which is based on the record keeping as specified in Section C.2, C.3 and C.4, and corresponding values for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3).

2. Any determination of OC content, solids contents, or density of coating material shall

Schlabach Finishing

DTI Application: 06-08162

Facility ID: 0679000308Emissions Unit ID: **R002**

be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by

Issued: 1/9/2007

an analysis of each coating, as applied, by Reference Method 24 or Method 24A. Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the OC content of coating materials by Reference Method 24 or an equivalent or alternative method.

F. Miscellaneous Requirements

1. Based on information provided by the permittee, the facility Potential to Emit (PTE) for Hazardous Air Pollutants (HAP) is below the major source thresholds of 10 tons per year or more of any single HAP and 25 tons per year or more of any combination of HAP based on the facility operations and the maximum HAP content of the coatings/inks used. If any changes in the operations and/or coating/ink formulations occur, the PTE calculation should be modified accordingly. Any increase in PTE above the major source thresholds would subject the source to any applicable Maximum Achievable Control Technology (MACT) and Title V requirements.

Issued: 1/9/2007

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.

Operations, Property, and/or Equipment - (R004) - Wood furniture coating booth number 4 vented through dry filters

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>For each day that photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are not employed, the organic compound (OC) emissions from coatings and clean up materials shall not exceed 14.0 pounds per hour, as calculated in C.3.f below.</p> <p>The OC emissions from all the coatings and cleanup materials for emissions unit R001 shall be less than 25.0 tons per year.</p> <p>The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2).</p>
OAC rule 3745-31-05(C) Synthetic minor to avoid Title V applicability.	The OC emissions from all the coatings and cleanup materials for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3) shall be less than 25.0 tons per year, as a rolling, 12-month summation, combined.
OAC rule 3745-21-07(G)(2)	See A.2.a. below.

2. Additional Terms and Conditions

- 2.a For each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the OC emissions from all coatings and from photochemically reactive cleanup materials shall not exceed 8 pounds per hour and 40 pounds per day. OC emissions from clean up material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

Schlabach Finishing

DTI Application: 06 08162

Facility ID: 0679000308

Emissions Unit ID: R004

Issued: 1/9/2007

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
2. The weight of organic material in solvent evaporated (solvent usage), which is equivalent to OC emissions, shall not exceed 25.0 tons during any 12-month rolling period from emissions units R001, R002, R004, R005 and coating booth # 3, combined.

Compliance with this limitation shall be based upon a rolling, 12-month summation of facility-wide solvent usage, calculated monthly, using the following equation:

Solvent Usage = [Summation (pounds of coatings employed x solvent content of coatings in percent OC by weight) + (pounds of cleanup solvent employed) for all calendar months] x 1 ton per 2000 pounds

The permittee has sufficient monthly records of solvent usage and OC emissions to begin calculating the rolling, 12-month summations upon final issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup material are employed in this emissions unit:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the OC content of each coating and photochemically reactive cleanup material, in pounds OC per gallon;
 - d. the total emissions rate for all coatings and photochemically reactive cleanup materials, in pounds OC per day;

Issued: 1/9/2007

- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[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).]

- 3. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup materials are not employed in this emissions unit:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content of each coating, in pounds per gallon;
 - d. the total OC emission rate for all coatings, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate for all coatings, i.e., (d)/(e), in pounds per hour.
- 4. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each cleanup material;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
 - c. the OC content of each non-photochemically cleanup material, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed minus the number of gallons of cleanup material recovered for disposal; and

Issued: 1/9/2007

- e. the total OC emissions from all cleanup materials employed, in tons per month, i.e., sum of (c) times (d).

[Note: Usage of photochemically reactive cleanup material shall be recorded daily according to C.1 above.]

5. The permittee shall calculate and record the actual OC emissions for each month, (i.e., sum of daily coating OC emissions for each month plus the monthly cleanup OC emissions) for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3) combined. The permittee shall also maintain monthly records of the rolling, 12-month summation of the OC emissions, calculated by adding the current month's OC emissions to the OC emissions for the preceding eleven calendar months.

D. Reporting Requirements

1. The permittee shall notify the Director in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southeast District Office (SEDO) within 30 days after the event occurs.
2. The permittee shall notify SEDO, in writing of any daily record showing:
 - a. for the days during which a photochemically reactive material was employed, each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such incidence; and
 - b. for the days during which a photochemically reactive material was not employed, each day during which the average OC emissions from the coatings and cleanup materials exceeded 12.7 pounds per hour, and the actual average OC emissions for each such day.
 - c. each 12-month period during which the OC emissions from the coatings and cleanup materials exceeded 25.0 tons for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3) combined, and the actual OC emissions for each such 12-month period.

The permittee shall identify the cause for the emission exceedance and any corrective

Emissions Unit ID: **R004**

action taken. The notification shall include a copy of such record and shall be sent to SEDO within 30 days after the event occurs.

3. The permittee shall submit deviation (excursion) reports that identify any exceedance of the rolling, 12-month OC emission limitation.
4. The permittee shall submit a report to SEDO, by January 31 of each year, that includes the total annual OC emissions which were emitted during the previous calendar year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Issued: 1/9/2007

- a. Emissions Limitation:
For each day that a photochemically reactive material is employed, the OC emissions from all coatings and from photochemically reactive cleanup materials shall not exceed 8 pounds per hour.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.f. based upon the record keeping specified in Section C.2.

- b. Emissions Limitation:
For each day that a photochemically reactive material is employed, the OC emissions from all coatings and from photochemically reactive cleanup materials shall not exceed 40 pounds per day.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.d. based upon the record keeping specified in Section C.2.

- c. Emissions Limitation:
For each day that photochemically reactive materials are not employed, the OC emissions from coatings and clean up materials shall not exceed 14.0 pounds per hour, as a daily average.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.3.f. based on the record keeping specified in Section C.3.

- d. Emissions Limitation:
The OC emissions from all the coatings and cleanup materials for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3) shall be less than 25.0 tons per year, as a rolling, 12-month summation, combined.

Applicable Compliance Method:
Compliance shall be determined by summing the value recorded in C.5, which is based on the record keeping as specified in Section C.2, C.3 and C.4, and corresponding values for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3).

2. Any determination of OC content, solids contents, or density of coating material shall

Issued: 1/9/2007

be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by

Emissions Unit ID: **R004**

an analysis of each coating, as applied, by Reference Method 24 or Method 24A. Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the OC content of coating materials by Reference Method 24 or an equivalent or alternative method.

F. Miscellaneous Requirements

1. Based on information provided by the permittee, the facility Potential to Emit (PTE) for Hazardous Air Pollutants (HAP) is below the major source thresholds of 10 tons per year or more of any single HAP and 25 tons per year or more of any combination of HAP based on the facility operations and the maximum HAP content of the coatings/inks used. If any changes in the operations and/or coating/ink formulations occur, the PTE calculation should be modified accordingly. Any increase in PTE above the major source thresholds would subject the source to any applicable Maximum Achievable Control Technology (MACT) and Title V requirements.

Emissions Unit ID: R005

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.

Operations, Property, and/or Equipment - (R005) - Wood furniture coating booth number 5 vented through dry filters

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>For each day that photochemically reactive materials [as defined in OAC 3745-21-01(C)(5)] are not employed, the organic compound (OC) emissions from coatings and clean up materials shall not exceed 10.5 pounds per hour, as calculated in C.3.f below.</p> <p>The OC emissions from all the coatings and cleanup materials for emissions unit R001 shall be less than 25.0 tons per year.</p> <p>The requirements of this rule also include compliance with requirements of OAC rule 3745-21-07(G)(2).</p>
OAC rule 3745-31-05(C) Synthetic minor to avoid Title V applicability.	The OC emissions from all the coatings and cleanup materials for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3) shall be less than 25.0 tons per year, as a rolling, 12-month summation, combined.
OAC rule 3745-21-07(G)(2)	See A.2.a. below.

2. Additional Terms and Conditions

- 2.a For each day that a photochemically reactive material [as defined in OAC 3745-21-01(C)(5)] is employed, the OC emissions from all coatings and from photochemically reactive cleanup materials shall not exceed 8 pounds per hour and 40 pounds per day. OC emissions from clean up material that is not a photochemically reactive material shall not be included in showing compliance with this limit.

Issued: 1/9/2007

B. Operational Restrictions

1. All exhaust from the spray booth shall pass through the dry filters whenever this emissions unit is in operation.
2. The weight of organic material in solvent evaporated (solvent usage), which is equivalent to OC emissions, shall not exceed 25.0 tons during any 12-month rolling period from emissions units R001, R002, R004, R005 and coating booth # 3, combined.

Compliance with this limitation shall be based upon a rolling, 12-month summation of facility-wide solvent usage, calculated monthly, using the following equation:

Solvent Usage = [Summation (pounds of coatings employed x solvent content of coatings in percent OC by weight) + (pounds of cleanup solvent employed) for all calendar months] x 1 ton per 2000 pounds

The permittee has sufficient monthly records of solvent usage and OC emissions to begin calculating the rolling, 12-month summations upon final issuance of this permit.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records that document all time periods when the dry filters were not in service when the emissions unit was in operation.
2. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup material are employed in this emissions unit:
 - a. the company identification for each coating and photochemically reactive cleanup material employed;
 - b. the number of gallons of each coating and photochemically reactive cleanup material employed;
 - c. the OC content of each coating and photochemically reactive cleanup material, in pounds OC per gallon;
 - d. the total emissions rate for all coatings and photochemically reactive cleanup materials, in pounds OC per day;

Emissions Unit ID: **R005**

- e. the total number of hours the emissions unit was in operation; and
- f. the average hourly OC emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[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).]

3. The permittee shall collect and record the following information for each day that photochemically reactive coatings or cleanup materials are not employed in this emissions unit:
 - a. the company identification for each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the OC content of each coating, in pounds per gallon;
 - d. the total OC emission rate for all coatings, in pounds per day;
 - e. the total number of hours the emissions unit was in operation; and
 - f. the average hourly OC emission rate for all coatings, i.e., (d)/(e), in pounds per hour.
4. The permittee shall collect and record the following information for each month for this emissions unit:
 - a. the company identification for each cleanup material;
 - b. documentation on whether or not each cleanup material employed is a photochemically reactive material as defined in OAC rule 3745-21-01(C)(5);
 - c. the OC content of each non-photochemically cleanup material, in pounds per gallon;
 - d. the number of gallons of each cleanup material employed minus the number of gallons of cleanup material recovered for disposal; and
 - e. the total OC emissions from all cleanup materials employed, in tons per month,

Issued: 1/9/2007

i.e., sum of (c) times (d).

[Note: Usage of photochemically reactive cleanup material shall be recorded daily according to C.1 above.]

5. The permittee shall calculate and record the actual OC emissions for each month, (i.e., sum of daily coating OC emissions for each month plus the monthly cleanup OC emissions) for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3) combined. The permittee shall also maintain monthly records of the rolling, 12-month summation of the OC emissions, calculated by adding the current month's OC emissions to the OC emissions for the preceding eleven calendar months.

D. Reporting Requirements

1. The permittee shall notify the Director in writing of any daily record showing that the dry filters were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Southeast District Office (SEDO) within 30 days after the event occurs.
2. The permittee shall notify SEDO, in writing of any daily record showing:
 - a. for the days during which a photochemically reactive material was employed, each day during which the OC emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour and/or 40 pounds per day, and the actual OC emissions for each such incidence; and
 - b. for the days during which a photochemically reactive material was not employed, each day during which the average OC emissions from the coatings and cleanup materials exceeded 10.5 pounds per hour, and the actual average OC emissions for each such day.
 - c. each 12-month period during which the OC emissions from the coatings and cleanup materials exceeded 25.0 tons for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3) combined, and the actual OC emissions for each such 12-month period.

The permittee shall identify the cause for the emission exceedance and any corrective action taken. The notification shall include a copy of such record and shall be sent to

Emissions Unit ID: **R005**

SEDO within 30 days after the event occurs.

3. The permittee shall submit deviation (excursion) reports that identify any exceedance of the rolling, 12-month OC emission limitation.
4. The permittee shall submit a report to SEDO, by January 31 of each year, that includes the total annual OC emissions which were emitted during the previous calendar year.

E. Testing Requirements

1. Compliance with the allowable emission limitations in Section A.1 and A.2 of these terms and conditions shall be determined in accordance with the following methods:

Issued: 1/9/2007

- a. Emissions Limitation:
For each day that a photochemically reactive material is employed, the OC emissions from all coatings and from photochemically reactive cleanup materials shall not exceed 8 pounds per hour.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.f. based upon the record keeping specified in Section C.2.

- b. Emissions Limitation:
For each day that a photochemically reactive material is employed, the OC emissions from all coatings and from photochemically reactive cleanup materials shall not exceed 40 pounds per day.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.2.d. based upon the record keeping specified in Section C.2.

- c. Emissions Limitation:
For each day that photochemically reactive materials are not employed, the OC emissions from coatings and clean up materials shall not exceed 12.7 pounds per hour, as a daily average.

Applicable Compliance Method:
Compliance shall be determined by the daily values calculated in C.3.f. based on the record keeping specified in Section C.3.

- d. Emissions Limitation:
The OC emissions from all the coatings and cleanup materials for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3) shall be less than 25.0 tons per year, as a rolling, 12-month summation, combined.

Applicable Compliance Method:
Compliance shall be determined by summing the value recorded in C.5, which is based on the record keeping as specified in Section C.2, C.3 and C.4, and corresponding values for all wood furniture manufacturing operations at this facility (emissions units R001, R002, R004, R005 and coating booth # 3).

2. Any determination of OC content, solids contents, or density of coating material shall

Issued: 1/9/2007

be based on the coating materials as employed (as applied), including the addition of any thinner or viscosity reducer to the coatings. In accordance with OAC rule 3745-21-04(B)(5), the permittee shall determine the composition of the coatings by formulation data supplied by the manufacturer of the coating materials, or from data determined by

Issued: 1/9/2007

an analysis of each coating, as applied, by Reference Method 24 or Method 24A. Ohio EPA may require the permittee, if it uses formulation data supplied by the manufacturer, to determine data used in the calculation of the OC content of coating materials by Reference Method 24 or an equivalent or alternative method.

F. Miscellaneous Requirements

1. Based on information provided by the permittee, the facility Potential to Emit (PTE) for Hazardous Air Pollutants (HAP) is below the major source thresholds of 10 tons per year or more of any single HAP and 25 tons per year or more of any combination of HAP based on the facility operations and the maximum HAP content of the coatings/inks used. If any changes in the operations and/or coating/ink formulations occur, the PTE calculation should be modified accordingly. Any increase in PTE above the major source thresholds would subject the source to any applicable Maximum Achievable Control Technology (MACT) and Title V requirements.