



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
SCIOTO 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: 07-00594

Fac ID: 0773000169

DATE: 4/10/2008

Manufacturing Ventures-US Plank Flooring
Don Hensley
9597 State Route 125
West Portsmouth, OH 45663-9015

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

PCHD



**Permit To Install
Terms and Conditions**

**Issue Date: 4/10/2008
Effective Date: 4/10/2008**

FINAL PERMIT TO INSTALL 07-00594

Application Number: 07-00594
Facility ID: 0773000169
Permit Fee: **\$200**
Name of Facility: Manufacturing Ventures-US Plank Flooring
Person to Contact: Don Hensley
Address: 9597 State Route 125
West Portsmouth, OH 45663-9015

Location of proposed air contaminant source(s) [emissions unit(s)]:
**9597 State Route 125
West Portsmouth, Ohio**

Description of proposed emissions unit(s):
Wood Floor roll coat finishing line with baghouse.

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

Chris Korleski
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

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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)

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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.

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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>
VOC	27.24
PE	9.9

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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.

Operations, Property, and/or Equipment - (R001) - wood floor finishing line vented to dust collector. Chapter 31 modification to add additional coatings.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The volatile organic compound (VOC) emissions from all coatings shall not exceed 5.81 pounds per hour, excluding cleanup.</p> <p>The VOC emissions from all coating and cleanup materials from this emission unit shall not exceed 27.24 tons per year</p> <p>See section A.2.a below.</p>
OAC rule 3745-31-05(C)	Particulate emissions (PE) shall not exceed 9.9 tons per year. (See section A.2.b below.)
OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
OAC rule 3745-17-11(B)	PE shall not exceed 35.4 pounds per hour.

2. Additional Terms and Conditions

- 2.a The VOC content of each coating shall not exceed 5.7 lbs/gal, as applied.
- 2.b Permit to Install 07-00594 for this air contaminant source takes into account the use of a dust collection system, whenever this air contaminant source is in operation, with a minimum grain loading efficiency of 0.02 grains/dscf of exhaust for PE, as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

B. Operational Restrictions

Issued: 4/10/2008

Emissions Unit ID: **R001**

None

Issued: 4/10/2008

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each day for the coating line:
 - a. the company identification for each coating and cleanup material employed;
 - b. the VOC content of each coating, in lbs/gallon, as applied;
 - c. the number of gallons of each coating employed, as applied;
 - d. the total VOC emissions from all coatings employed, in lbs/day, [i.e., sum of (c) times (b)];
 - e. the total number of hours the emission unit was in operation; and
 - f. the average hourly VOC emission rate from all coatings employed, in lbs/hr, [i.e., (d) divided by (e)].
2. The permittee shall collect and record the following information for each month for the emissions unit:
 - a. the company identification of each cleanup material employed;
 - b. the number of gallons of each VOC containing cleanup material employed;
 - c. the VOC content of each cleanup material employed, in lbs/gallon; and
 - d. the total VOC emissions from all VOC containing cleanup materials employed, in lbs/month, [i.e., sum of (b) times (c)].
3. The permittee shall calculate and record the total VOC emissions from all coatings and cleanup materials employed, in tons per calendar year; [i.e., (the summations of the daily VOC emissions, from section C.1.d, for the calendar year + the monthly cleanup material VOC emissions from section C.2.d) divided by 2000 lbs/ton].
4. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also

note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify:
 - a. each day during the VOC emissions exceeded the hourly allowable emissions limitation specified above; and
 - b. each day during which the VOC content of any coating exceeded the pounds per gallon limitation specified above .

The quarterly deviation reports shall be submitted to the Portsmouth Local Air Agency in accordance with the General Terms and Conditions of this permit. These reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarter.

2. The permittee shall also submit annual reports that specify the total organic compound emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this

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emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Portsmouth Local Air Agency each year and shall cover the previous six-month periods.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

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a. Emission Limitation:

The volatile organic compound (VOC) emissions from all coatings shall not exceed 5.81 pounds per hour, excluding cleanup.

Applicable Compliance Method:

Compliance with the daily allowable VOC emission limitation shall be determined based upon the record keeping requirements specified in Section C.1 of this permit.

b. Emission Limitation:

The VOC emissions from all coating and cleanup materials from this emission unit shall not exceed 27.24 tons per year

Applicable Compliance Method:

Compliance with the annual allowable VOC emission limitation shall be based upon the record keeping requirements specified in Section C.1, C.2 and C.3 of this permit.

c. Emission Limitation:

Particulate emissions (PE) shall not exceed 9.9 tons per year.

Applicable Compliance Methods:

Compliance shall be demonstrated by multiplying the maximum airflow of the dust collector, 5,500 dscf/min by 0.02 gr/dscf, and 60 min/hr and 8760 hrs/yr and dividing by 7,000 gr/lb and 2000 lb/ton.

d. Emission Limitation:

PE shall not exceed 35.4 pounds per hour.

Applicable Compliance Methods:

Compliance shall be demonstrated by multiplying the maximum airflow of the dust collector, 5,500 dscf/min by 0.02 grain/dscf, and 60 min/hr and dividing

Emissions Unit ID: **R001**

by 7,000 grains/lb.

e. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Methods:

If required, compliance shall be demonstrated in accordance with the requirements specified in 40 CFR Part 60, Appendix A, Method 9.

F. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the "Toxic Air Contaminant Statute" in ORC 3704.03(F)(4)(b) was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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Emissions Unit ID: **R001**

SIC CODE 2426 SCC CODE 40202111 EMISSIONS UNIT ID R001
 EMISSIONS UNIT DESCRIPTION wood floor finishing line vented to dust collector

DATE INSTALLED apr 2008

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	35.4 lbs/hr	9.9	35.4 lbs/hr	9.9
PM ₁₀					
Sulfur Dioxide					
Organic Compounds	attainment	5.81 lbs/hr	27.24	5.81 lbs/hr	27.24
Nitrogen Oxides					
Carbon Monoxide					
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination the VOC content of each coating shall not exceed 5.7 lbs/gal

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____