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Facility Name: **Charles Heavener**

Application Number: **06-5688**

Date: **January 27, 1999**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES

The proposed source(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 are inadequate or cannot meet applicable standards.

If the construction of the proposed source(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 Ohio Administrative Code (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.

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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 applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 30 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be filed no later than thirty days after commencement of operation.

SOURCE OPERATION 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 and regulations.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Charles Heavener** located in **Tuscarawas** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

| <u>Ohio EPA Source Number</u> | <u>Source Identification Description</u> | <u>BAT Determination</u> | <u>Applicable Federal & OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|-------------------------------|--|---|---|---|
| R001 | Wood furniture coating line | Compliance with OEPA Air Toxics Policy and OAC 3745-21-07 | 3745-31-05 | On any day in which photochemically reactive materials are employed, emissions of organic compounds shall not exceed 8 pounds per hour nor 40 pounds per day nor 7.3 tons per year. |
| | | | 3745-21-07 (G)(2) | * |

* Compliance with the emission limits from OAC rule 3745-21-07(G)(2) shall satisfy the BAT requirement of OAC rule 3745-31-05.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| <u>Pollutant</u> | <u>Tons/Year</u> |
|-------------------|------------------|
| Organic Compounds | 7.3 |

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REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Southeast District Office, 2195 Front Street, Logan, Ohio 43138.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Southeast District Office, 2195 Front Street, Logan, Ohio 43138.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. COMPLIANCE WITH THE AIR TOXICS POLICY

1. This permit allows the use of the coatings and cleanup materials specified by the permittee in the application for PTI number 06-5688. In conjunction with the best available technology requirements of OAC rule 3745-31-05, the methyl ethyl ketone, isobutyl acetate, xylene, 1,2,4 trimethylbenzene, ethylbenzene, toluene, and butyl

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acetate emission limitations specified in this permit for emissions unit R001 was established in accordance with the Ohio EPA's "Air Toxics Policy" and are based on both the coating and cleanup material formulation data and the design parameters of the emissions units' exhaust system, as specified in the application. Compliance with the Ohio EPA's "Air Toxics Policy" was demonstrated for each pollutant based on the SCREEN 3 model and a comparison of the predicted 1-hour maximum ground-level concentration to the MAGLC. The following summarizes the results of the modeling for each pollutant:

Pollutant: Methyl Ethyl Ketone

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 2.7

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2491

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 14,048

Pollutant: Isobutyl Acetate

TLV (ug/m3): 713,000

Maximum Hourly Emission Rate (lbs/hr): 1.3

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1205

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16,976

Pollutant: Xylene

TLV (ug/m3): 434,000

Maximum Hourly Emission Rate (lbs/hr): 5.2

Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 4818

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10333

Pollutant: 1,2,4 Trimethylbenzene

TLV (ug/m3): 123,000

Maximum Hourly Emission Rate (lbs/hr): 2.03

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Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1881
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 2929

Pollutant: Ethylbenzene

TLV (ug/m3): 434,000
Maximum Hourly Emission Rate (lbs/hr): 1.4
Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1297
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 10,333

Pollutant: Toluene

TLV (ug/m3): 188,000
Maximum Hourly Emission Rate (lbs/hr): 1.6
Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1482
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 4476

Pollutant: Butyl Acetate

TLV (ug/m3): 713,000
Maximum Hourly Emission Rate (lbs/hr): 2.5
Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 2316
Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 16976

2. As long as the application of the "Air Toxics Policy" continues to show compliance with the applicable MAGLC, the permittee may implement any of the following changes with prior notification to and approval from the appropriate Ohio EPA District Office or local air agency:
 - a. any changes in the composition of the coatings or solvents, or the use of new coatings or solvents, 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

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handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;

- b. any change to the emissions unit or its exhaust parameters (e.g., increased emission rate, reduction of exhaust gas flow rate, and decreased stack height);
 - c. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in the emission of any of the exempted organic compounds included in the definition of "OC" [OAC rule 3745-21-01(B)(6)]; and,
 - d. any change in the composition of the coatings or cleanup materials, or use of new coatings or cleanup materials, that would result in an increase in emissions of any "Hazardous Air Pollutants" (HAPS) as defined in OAC rule 3745-77-01(V).
3. For any change to the emissions unit or its method of operation that would either require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a permit to install prior to the change.

B. MONITORING AND RECORDKEEPING REQUIREMENT

1. The permittee shall collect and record the following information for each day for the coating operation:
 - 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;

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- c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
- d. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;
- e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation;
- f. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average); and,
- g. the total organic compound emission rate for all coatings and photochemically reactive cleanup materials, in pounds per year (the sum of (d) for all operating days in the calendar year).

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

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, if a strip-chart recorder is employed, for continuous monitoring instrumentation, and copies of all reports required by the permit. Such records may be maintained in computerized form.

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C. REPORTING REQUIREMENT

1. The permittee shall submit deviation (excursion) reports which include the following information:
 - a. for the days during which a photochemically reactive material was employed, 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; and,
 - b. for the days during which a photochemically reactive material was employed, 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.

These reports shall be submitted within 30 days after the occurrence.

D. COMPLIANCE DETERMINATION

1. Compliance with the emission limitations of 8 pounds OC per hour, 40 pounds of OC per day, and 7.3 tons OC per year shall be based upon the recordkeeping specified in 1.f, 1.d, and 1.g respectively.