



07/27/2026

Roy Miller
Country View Woodworking, Ltd.
7824 State Route 241
Millersburg, OH 44654

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0238000184
Permit Number: P0140690
Permit Type: Initial Installation
County: Holmes

Yes	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
Yes	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (P110) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency Weekly Review and Public Notices website, [Weekly Review and Public Notices](#). A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search webpage: [eDocument Search / Ohio Environmental Protection Agency](#). Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrea Moore
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street Suite 700
PO Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Rd.
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice appears on the Ohio EPA Weekly Review and Public Notices website, [Weekly Review and Public Notices / Ohio Environmental Protection Agency](#). You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NEDO

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: [*Weekly Review and Public Notices / Ohio Environmental Protection Agency*](#) or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-3037 email: [*HClerk@epa.ohio.gov*](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install and Operate Initial Installation

Country View Woodworking, Ltd.
7824 State Route 241

Millersburg, OH 44654

ID#: P0140690

Date of Action: 07/27/2026

Permit Desc: Permit to install R005 along with updated facility terms and conditions.

The permit and complete instructions for requesting information or submitting comments may be obtained at: <https://ohioepa.commentinput.com> - Search by entering the permit # P0140690 the "Search Projects" search box.

Permit Strategy Write-Up

1. Check all that apply:

☒ Synthetic Minor Determination

☐ Netting Determination

2. Source Description:

Country View Woodworking –is a manufacturer of wood furniture and performs wood furniture coating. The facility currently has 4 spray booths' (R001, R002, R003, and R004). The company has made a request to add a 5th spray booth (R005).

3. Facility Emissions and Attainment Status:

The facility is located at Millersburg, Holmes County, an area designated as "attainment" for all criteria pollutants, such as ozone, sulfur dioxide, PM, carbon monoxide and lead. Country View Woodworking is a minor source of PM and would be a "Major Source" for emissions of VOC, each individual HAP, and combined total HAPs. The facility is taking federally enforceable restrictions of VOC emissions from all coating operations (R001, R002, R003, R004, and R005), as well as facility-wide emissions of each individual HAP and combined total HAPs. Therefore, the requirements of Title V and the Wood Furniture MACT, 40 CFR Part 63, subpart JJ, will not be applicable.

4. Source Emissions:

This FEPTIO contains the following federally enforceable restrictions, based upon a rolling, 12-month period:

1. 24.9 TPY of VOC emissions from EUs R001, R002, R003, R004, and R005, combined; and
2. Facility-wide emissions of:
 - a. 5 TPY of each individual HAP; and
 - b. 12.5 TPY of combined total HAPs.

Country View Woodworking is also required by this permit to track gallons of coating used along with VOC and HAP contents of each coating.

5. Conclusion:

The emission limitations contained in this FEPTIO are adequate to provide federally enforceable restrictions to ensure that the applicable MACT and Title V thresholds will not be exceeded.

6. Please provide additional notes or comments as necessary:

None

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



Draft Permit-to-Install and Operate
Country View Woodworking, Ltd.
Permit Number: P0140690
Facility ID: 0238000184
Effective Date: To be entered upon final issuance

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC _{R001 - R005}	24.9
HAP _{Facility-wide}	5
HAPs _{Facility-wide}	12.5



**Environmental
Protection
Agency**

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Country View Woodworking, Ltd.

Facility ID: 0238000184
Permit Number: P0140690
Permit Type: Initial Installation
Issued: 07/27/2026
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install and Operate
for
Country View Woodworking, Ltd.

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Authorization

Facility ID: 0238000184
Application Number(s): A0082027A0082027
Permit Number: P0140690
Permit Description: Permit to install R005 along with updated facility terms and conditions.
Permit Type: Initial Installation
Permit Fee: \$300.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 07/27/2026
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation
Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page to:

Country View Woodworking, Ltd.
7824 State Route 241
Millersburg, OH 44654

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Rd.
Twinsburg, OH 44087
(330)963-1200

The above-named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

John Logue
Director



Authorization (continued)

Permit Number: P0140690

Permit Description: Permit to install R005 along with updated facility terms and conditions.

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

Emissions Unit ID:	R005
Company Equipment ID:	Q-One Spray Booth #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM ₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	PM _{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m ³ = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH ₄ = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO ₂ = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m ³ = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH ₃ = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO ₂ = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO _x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO ₂ = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H ₂ S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H ₂ SO ₄ = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m ³ = micrograms per cubic meter

A. Standard Terms and Conditions

1. What does this permit-to-install and operate (PTIO) allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- a) PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11 or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- b) Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (either electronically through Ohio EPA's eBusiness Center: Air Services web service or postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended once by 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and permit evaluation report (PER) obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his/her authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shut down emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, the new owner or operator must follow the procedures in OAC Chapter 3745-31-07, including notifying Ohio EPA or the local air agency of the change in ownership or operator within thirty days of the transfer date. Any transferee of this permit shall assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a PTI document, the facility-wide T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.



(1) None.

b) For the purpose of a PTO document, the facility-wide T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

(1) B.2

2. Facility-Wide Restrictions

a) Applicable Emissions Limitations and/or Control Requirements

(1) Facility-wide emissions shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Synthetic minor to avoid being subject to Title V and 40 CFR Part 63, Subpart JJ requirements)	See B.2.a)(2)a. and B.2.a)(2)b.

(2) Additional Terms and Conditions

a. Emissions, based upon a rolling, 12-month period, from all the EUs R001, R002, R003, R004, and R005, combined, shall not exceed the following:

i. 24.9 TPY of VOC;

ii. 5 TPY of each individual HAP¹.and

iii. 12.5 TPY of total combined HAPs.

b. At least 90 percent (90%) of each individual HAP and total combined HAPs emissions facility-wide per rolling 12-month period shall be associated with the manufacture of wood furniture or wood furniture components, as defined in 40 CFR § 63.801.

b) Operational Restrictions

(1) To ensure enforceability during the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the following VOC, each individual HAP, and total combined HAPs emission levels, from coatings and cleanup materials for EUs R001, R002, R003, R004, and R005, combined, specified in the following table:

¹ A listing of the HAPs can be found in Section 112(b) of the Clean Air Act, and is also available at U.S. EPA's website at <https://www.epa.gov/haps/initial-list-hazardous-air-pollutants-modifications>.



Month(s)	Maximum Allowable Cumulative VOC Emissions (tons)	Maximum Allowable Cumulative each Individual HAP Emissions (tons)	Maximum Allowable Cumulative Total Combined HAPs Emissions (tons)
1	2.5	0.5	1.3
1-2	5.0	1.0	2.6
1-3	7.5	1.5	3.9
1-4	10.0	2.0	5.2
1-5	12.5	2.5	6.5
1-6	15.0	3.0	7.8
1-7	17.5	3.5	9.1
1-8	20.0	4.0	10.4
1-9	22.5	4.5	11.7
1-10	< 24.9	< 5	< 12.5
1-11	< 24.9	< 5	< 12.5
1-12	< 24.9	< 5	< 12.5

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual VOC, each individual HAP, and total combined HAPs emission limitations shall be based upon a rolling, 12-month summation of VOC, each individual HAP, and total combined HAPs emissions for EUs R001, R002, R003, R004, and R005, combined.

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

- (1) The permittee shall maintain the following records of the materials employed in EUs R001, R002, R003, R004, and R005, for a period of not less than five years and shall make the records available to the Director or any authorized representative of the Director for review during normal business hours:
 - a. A certified product data sheet (or other formulation data sheets provided by the manufacturer) for each coating material (e.g., stain, sealer, and topcoat), any thinners, any VOC-containing additive, any HAP-containing additive, and any cleanup material; and
 - b. A record of the VOC content, in (lb(s))/gal. of VOC, of each cleanup material employed, each coating (stain, sealer, topcoat) material, as applied, less water and exempt solvents, including documentation on any thinner or other VOC-containing materials added to the coating materials before application, and any other VOC-containing materials employed;
- (2) The permittee shall collect and record the following information each month for all materials that are employed in EUs R001, R002, R003, R004, and R005, combined:
 - a. the company identification for each coating and cleanup material employed;
 - b. the number of gallons of each coating and cleanup material employed minus the number of gallons of each coating and cleanup material recovered for disposal;
 - c. the VOC content of each coating and cleanup material, as applied, in lbs/gallon;



- d. the total monthly VOC emissions, defined as “VOC_m”, from all coatings and cleanup materials employed in EUs R001, R002, R003, R004, and R005 combined, shall be calculated using the following equation:

$$VOC_m = \sum_i^n [VOC_c * V]i$$

where:

VOC_m= total monthly VOC emissions, in lbs/month;

VOC_c= VOC content of each coating and cleanup material, as applied, as recorded in section c)(2)c. above, in lbs/gal;

V= volume of each coating and cleanup material employed minus the volume of each coating and cleanup material recovered for disposal, as recorded in section c)(2)b. above, in gals/month;

n= total number of different coatings and cleanup materials employed during the month; and

i= subscript denoting an individual coating or cleanup material employed during the month.

- e. the rolling 12-month total VOC emissions, in ton(s) for EUs R001, R002, R003, R004, and R005 combined.

- f. the actual each individual HAP² content for each coating and cleanup material, in lbs/gal, as applied;

- g. the total monthly individual HAP emissions, defined as “HAP_m”, from EUs R001, R002, R003, R004, and R005 combined, shall be calculated using the following equation:

$$HAP_m = \sum_i^n [HAP_c * V]i$$

where:

HAP_m= total monthly each individual HAP emissions, in lbs/month; and

HAP_c= Each individual HAP content of each coating and cleanup material, as applied, as recorded in section c)(2)f. above, in lbs/gal.

- h. the rolling, 12-month summation of each individual HAP emissions, in tons, from EUs R001, R002, R003, R004, and R005 combined.

² A listing of the HAPs can be found in Section 112(b) of the Clean Air Act. Material Safety Data Sheets or Environmental Data Sheets typically include a listing of the solvent contained in the coatings or cleanup materials.



- i. the monthly total combined HAPs emissions, defined as “THAP_m”, from EUs R001, R002, R003, R004, and R005 combined., shall be calculated using the following equation:

$$THAP_m = \sum_i^m HAP_m * j$$

where:

THAP_m= total monthly combined HAPs emissions, in lbs/month;

m= total number for different HAPs emissions during the month; and

j= Subscript denoting an individual single HAP emission during the month.

- j. the rolling, 12-month summation of total combined HAPs emissions, in tons, from EUs R001, R002, R003, R004, and R005 combined.

(3) The permittee shall keep the following information each month:

- a. The rolling, 12-month period facility-wide each individual HAP and total combined HAPs emissions, in tons;
- b. The rolling, 12-month period facility-wide each individual HAP and total combined HAPs emissions from the manufacture of wood furniture or wood furniture components, in tons;
- c. The percentage of facility-wide each individual HAP and total combined HAPs emissions which are associated with the manufacture of wood furniture or wood furniture components.

d) Reporting Requirements

- (1) The reports required by this permit shall be submitted in accordance with the reporting requirements specified in Section A, Standard Terms and Conditions.
- (2) All applications, notifications, or reports required in writing are to be submitted through Ohio EPA's eBusiness Center: Air Services online web portal. Hardcopy submissions will be accepted on an as-needed basis if the permittee cannot submit the required documents through Air Services. In the event of a hardcopy submission, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submittal of applications, notifications, or reports to Ohio EPA fulfills the requirement to submit information to the director, the appropriate Ohio EPA DO/LAA, and/or any other individual or organization identified as a recipient unless otherwise specified in this permit. Consistent with OAC rule 3745-15-03, the application, notification, or report is considered submitted on the date the submittal is successful using a valid electronic signature. Signatures by the signatory authority may be represented as provided through procedures established in Air Services.
- (3) The permittee shall submit an annual PER to Ohio EPA by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit



- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:
 - i. Any exceedances of the 24.9 TPY VOC emissions limit, based upon a rolling 12-month summation, of the VOC emissions from EUs R001, R002, R003, R004, and R005 combined;
 - ii. Any exceedances of the facility-wide 5 TPY of each individual HAP emissions;
 - iii. Any exceedances of the facility-wide 12.5 TPY of total combined HAPs emissions;
 - iv. Any exceedances of at least 90% each individual HAP and/or total combined HAPs emissions facility-wide per rolling 12-month period which are associated with the manufacture of wood furniture or wood furniture components.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the appropriate Ohio EPA DO/LAA.

e) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these T&C shall be determined in accordance with the following methods:
- a. Emission Limitation:

The total VOC emissions from EUs R001- R005, combined, based upon a rolling, 12-month summation, shall not exceed the following:

 - i. 24.9 TPY of VOC;
 - ii. 5 TPY of each individual HAP; and
 - iii. 12.5 TPY of total combined HAPs.

Applicable Compliance Method:

Compliance shall be demonstrated by the monitoring and recordkeeping requirements in section B.2.c)(2).



b. Emissions Limitation:

At least 90 percent (90%) of each individual HAP and total combined HAPs emissions facility-wide per rolling 12-month period shall be associated with the manufacture of wood furniture or wood furniture components.

Applicable Compliance Method:

Compliance shall be demonstrated by the monitoring and recordkeeping requirements in section B.2.c)(3).

C. Emissions Unit Terms and Conditions

1. R005, Q-One Spray Booth #1

Operations, Property and/or Equipment Description:

Inline, automatic spray booth for surface coating of wood furniture with passive filtration for particulate control.

- a) This permit document constitutes a PTI issued in accordance with ORC 3704.03(F) and a PTO issued in accordance with ORC 3704.03(G).

- (1) For the purpose of a PTI document, the EU T&C identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

- (2) For the purposes of a PTO document, the EU T&C identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The VOC emission limitation established pursuant to this rule is equivalent to the VOC emission limitation established pursuant to OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to PE from this air contaminant source since the controlled PTE is less than 10 TPY, taking into account the requirements under OAC rule 3745-17-11(C).
c.	OAC rule 3745-31-05(D)	See B.2.
d.	OAC rule 3745-17-11(C))	See c)(1), c)(2), d)(1), d)(2), d)(3), d)(4), and d)(5)
e.	OAC rule 3745-21-15	See b)(2)b.
f.	ORC 3704.03(F)(4)(d) and OAC rule 3745-114-01	See d)(7), d)(8), d)(9), d)(10), and e)(1)b.
g.	OAC rule 3745-21-07(M)(2)	See b)(2)a.

- (2) Additional Terms and Conditions

- a. In accordance with OAC rule 3745-21-07(A)(5), the requirements of OAC rule 3745-21-07(M)(2) are not applicable to EU R005, a new source as defined in OAC rule 3745-15-01, because installation of this EU commenced after February 18, 2008.



- b. This facility is located within Holmes County. In accordance with OAC rule 3745-21-15(A)(1)(a), OAC rule 3745-21-15 is not applicable.

c) Operational Restrictions

- (1) The permittee shall operate the associated dry filtration system for the control of PE whenever any of these EU is in operation and shall maintain the dry particulate filter in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.
- (2) In the event any of the particulate filter systems is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee, the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA DO/LAA upon request.
- (2) The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer, and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.
- (3) In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the EU is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.
- (4) The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:
 - a. The date of the inspection;
 - b. A description of each/any problem identified and the date it was corrected;
 - c. A description of any maintenance and repairs performed; and
 - d. The name of person who performed the inspection.

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

- (5) The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the EU was in operation, as well as a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the



permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

- (6) The permittee shall maintain the following records for each of EU R005:
- a. None.
- (7) The FEPTIO application for EU R005 was evaluated based on the actual materials and design parameters of the EUs' exhaust systems, as specified by the permittee. The *Toxic Air Contaminant Statute*, ORC 3704.03(F), was applied to these EUs for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant emitted using an air dispersion model such as AERSCREEN, AERMOD, ISCST3 or other Ohio EPA-approved model. The predicted one-hour maximum ground-level concentration results from the approved air dispersion model, were compared to the MAGLC, calculated as described in Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. The exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound emitted from the EUs (as determined from the raw materials processed and/or coatings or other materials applied), has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
- i. TLV from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices shall be used, if the chemical is listed; or
- ii. STEL or the ceiling value from the ACGIH "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent eight-hour TLV.
- b. TLV is divided by 10 to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is adjusted to account for the duration of the exposure or the operating hours of the EUs, that is, *X* hours per day and *Y* days per week, from that of eight hours per day and five days per week.
- d. The resulting calculation shall be used to determine the MAGLC:
- $$\frac{TLV}{10} * \frac{8}{X} * \frac{5}{Y} = 4 \frac{TLV}{XY} = MAGLC$$
- [Note: 24 hours per day was used for "X" and 7 days per week was used for "Y" as the operating hours of each of these EUs to determine the MAGLC.]
- e. The following summarizes the results of dispersion modeling for the significant toxic contaminants or "worst case" toxic contaminant(s):

Toxic Contaminant: Xylene.



TLV ($\mu\text{g}/\text{m}^3$): 86,756.65

Maximum Hourly Emission Rate (lb(s)/hr): 2.31

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 562.37

MAGLC ($\mu\text{g}/\text{m}^3$): 2067.58

Toxic Contaminant: Toluene.

TLV ($\mu\text{g}/\text{m}^3$): 75,370.14

Maximum Hourly Emission Rate (lb(s)/hr): 2.21

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu\text{g}/\text{m}^3$): 537.99

MAGLC ($\mu\text{g}/\text{m}^3$): 1794.33

The permittee, having demonstrated that emissions of xylene and toluene, from EU R005 were estimated to be less than 80% of the MAGLC, any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (8) Prior to making any physical changes to or changes in the method of operation of the EUs that could impact the parameters or values that were used in the predicted 1-hr maximum ground-level concentration, the permittee shall re-model any change to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hr maximum ground-level concentration include, but are not limited to, the following:
- a. Changes in the composition of the materials used or the use of new materials, that would result in the emissions of a new toxic air contaminant with a lower TLV than the lowest TLV previously modeled.
 - b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application.
 - c. Physical changes to the EUs or exhaust parameters (for example, increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines the *Toxic Air Contaminant Statute*, ORC 3704.03(F), will be satisfied with the above changes, Ohio EPA will not consider a change to be a *modification* under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), has been documented. If each change meets the definition of a *modification*, the permittee shall apply for and obtain a final FEPTIO prior to the change. The director may consider any significant departure from the operations of the EU(s), described in the permit application, as a modification that results in greater emissions than the emission rate modeled to determine the ground-level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.



- (9) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F):
- A description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (for example, the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.).
 - The MAGLC for each significant toxic contaminant or worst-case contaminant, calculated per the *Toxic Air Contaminant Statute*, ORC 3704.03(F).
 - A copy of the computer model run(s), that established the predicted one-hour maximum ground-level concentration that demonstrated the EUs to be in compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions.
 - The documentation of the initial evaluation of compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the EUs or the materials applied.
- (10) The permittee shall maintain a record of any change made to a parameter or value entered in the dispersion model used to demonstrate compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted one-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- e) Reporting Requirements
- (1) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements in permit term numbers d)(1) through d)(10):
- Any daily record showing that the dry particulate filter system was not in service or not operated according to manufacturer's recommendations (with any documented modifications made by the permittee) when the EUs were in operation; and
 - Any changes made to a parameter or value used in the dispersion model, that was used to maintain compliance with the *Toxic Air Contaminant Statute*, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions, EUs, or the exhaust stack have been made, then the report shall include a statement to this effect.
- f) Testing Requirements
- (1) None.
- g) Miscellaneous Requirements
- (1) If the facility exceeds requirements under 40 CFR §63.800(b), EUs R001, R002, R003, R004, and R005 shall comply with all applicable provisions of 40 CFR Part 63, Subpart JJ starting on the applicable compliance date in 40 CFR §63.800.



Draft Permit-to-Install and Operate

Country View Woodworking, Ltd.

Permit Number: P0140690

Facility ID: 0238000184

Effective Date: To be entered upon final issuance