

West Virginia Department of Environmental Protection

*Earl Ray Tomblin
Governor*

Division of Air Quality

*Randy C. Huffman
Cabinet Secretary*

Permit to Modify through a Class II Administrative Update



R13-2449I

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45 C.S.R. 13 — Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the facility listed below is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Issued to:

Caperton Furnitureworks, LLC

Berkeley Springs

065-00003

A handwritten signature in blue ink, appearing to read "William F. Durham", written over a horizontal line.

*William F. Durham
Director*

Effective: June 10, 2015

This permit will supercede and replace Permit R13 2449H.

Facility Location: Berkeley Springs, Morgan County, West Virginia
Mailing Address: 270 Valley Road, Berkeley Springs, West Virginia 25411
Facility Description: Wood Household Furniture
NAICS Codes: 337122
UTM Coordinates: 737.8 km Easting • 4,389.6 km Northing • Zone 17
Permit Type: Class II Administrative Update

Description of Change:

Replace and relocate Spray Paint Booth identified as Emission Source (3S) from the 'Old Finishing Room' to the 'New Finishing Building'. There are no emissions increase associated with this modification. In addition, the format of the permit has been converted to the NSR Permit, Revision 2-1-13, boilerplate language.

Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§ 22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §22-5-14.

The source is not subject to 45CSR30.

Table of Contents

1.0. Emission Units	3
2.0. General Conditions	4
2.1. Definitions	4
2.2. Acronyms	4
2.3. Authority	5
2.4. Term and Renewal	5
2.5. Duty to Comply	5
2.6. Duty to Provide Information	5
2.7. Duty to Supplement and Correct Information	6
2.8. Administrative Permit Update	6
2.9. Permit Modification	6
2.10. Major Permit Modification	6
2.11. Inspection and Entry	6
2.12. Emergency	6
2.13. Need to Halt or Reduce Activity Not a Defense	7
2.14. Suspension of Activities	7
2.15. Property Rights	7
2.16. Severability	8
2.17. Transferability	8
2.18. Notification Requirements	8
2.19. Credible Evidence	8
3.0. Facility-Wide Requirements	9
3.1. Limitations and Standards	9
3.2. Monitoring Requirements	9
3.3. Testing Requirements	9
3.4. Recordkeeping Requirements	11
3.5. Reporting Requirements	11
4.0. Source-Specific Requirements	13
4.1. Limitations and Standards	13
4.2. Monitoring Requirements	17
4.3. Testing Requirements	19
4.4. Recordkeeping Requirements	19
APPENDIX A	21
APPENDIX B(1)	22
APPENDIX B(2)	23
APPENDIX C	24
APPENDIX D	25
CERTIFICATION OF DATA ACCURACY	26

1.0 Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
1S	1E	Spray Booth	2001	--	1C
2S	2E	Spray Booth	2001	--	2C
3S	3E	Spray Booth	2015	--	3C
4S	4E	Spray Booth	2001	--	4C
5S	5E	Spray Booth	2001	--	5C
6S	6E	Flow Coat Booth	2001	--	N
7S	6E	Flow Coat Booth	2001	--	N
8S	8E	Stain Dryer	2001	--	N
9S	Exhaust within building	Air Makeup	2001	--	N
10S	Exhaust within building	Air Makeup	2001	--	N
11S	11C*	Stroke Sander	2001	--	
12S	12E	Manual Spray Booth Chair Line	2001	--	12C
13S	13E1, 13E2	Manual Spray Booth Table Line	2001	--	13C1, 13C2
14S	14E1, 14E2	Manual Spray Booth Table Line	2001	--	14C1, 14C2
15S	15E1, 15E2	Sealer/Lacquer Dryer	2001	--	N
16S	Exhaust within building	Air Makeup	2001	--	N
17S	Exhaust within building	Air Makeup	2001	--	N
18S	Exhaust within building	Air Makeup	2001	--	N
19S	19E	Stain Dryer	2001	--	N
20S	20E	Stain Dryer	2001	--	N
25S	24E	Planer (Inside Existing Woodcutting Building)	2010	450 ft ³ /hr	Existing Baghouse #2 24C
26S	24E	Grinder (Inside Existing Woodcutting Building)	2010	21.35 ft ³ /hr	
27S	27E	Silo [after Existing Baghouse #2 (24C); before Screw Conveyors (28S-1 & 28S-2)]	2010	2 yd ³ (est.)	Silo Cyclone 27C
28S-1	--	Screw Conveyor [after Silo (27S) and before Bin (29S-1)]	2010		Full Enclosure
29S-1	--	Bin [after Screw Conveyor (28S-1) and before Boiler (22S)]	2010		
22S	22E	Boiler [after Bin (29S-1)]	2010	2.26 mm Btu/hr	Boiler Cyclone 22C
28S-2	--	Screw Conveyor [after Silo (27S) and before Container/Truck (29S-2)]	2010	2 yd ³ (est.)	Full Enclosure
29S-2	--	Container/Truck [after Screw Conveyor (28S-2)]	2010		Partial Enclosure

2.0. General Conditions

2.1. Definitions

- 2.1.1. All references to the "West Virginia Air Pollution Control Act" or the "Air Pollution Control Act" mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The "Clean Air Act" means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. "Secretary" means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45 CSR § 30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.2. Acronyms

CAAA	Clean Air Act Amendments	NO_x	Nitrogen Oxides
CBI	Confidential Business Information	NSPS	New Source Performance Standards
CEM	Continuous Emission Monitor	PM	Particulate Matter
CES	Certified Emission Statement	PM_{2.5}	Particulate Matter less than 2.5µm in diameter
C.F.R. or CFR	Code of Federal Regulations	PM₁₀	Particulate Matter less than 10µm in diameter
CO	Carbon Monoxide	Ppb	Pounds per Batch
C.S.R. or CSR	Codes of State Rules	pph	Pounds per Hour
DAQ	Division of Air Quality	ppm	Parts per Million
DEP	Department of Environmental Protection	Ppmv or ppmv	Parts per million by volume
dscm	Dry Standard Cubic Meter	PSD	Prevention of Significant Deterioration
FOIA	Freedom of Information Act	psi	Pounds per Square Inch
HAP	Hazardous Air Pollutant	SIC	Standard Industrial Classification
HON	Hazardous Organic NESHAP	SIP	State Implementation Plan
HP	Horsepower	SO₂	Sulfur Dioxide
lbs/hr	Pounds per Hour	TAP	Toxic Air Pollutant
LDAR	Leak Detection and Repair	TPY	Tons per Year
M	Thousand	TRS	Total Reduced Sulfur
MACT	Maximum Achievable Control Technology	TSP	Total Suspended Particulate
MDHI	Maximum Design Heat Input	USEPA	United States Environmental Protection Agency
MM	Million	UTM	Universal Transverse Mercator
MMBtu/hr or mmbtu/hr	Million British Thermal Units per Hour	VEE	Visual Emissions Evaluation
MMCF/hr or mmcf/hr	Million Cubic Feet per Hour	VOC	Volatile Organic Compounds
NA	Not Applicable	VOL	Volatile Organic Liquids
NAAQS	National Ambient Air Quality Standards		
NESHAPS	National Emissions Standards for Hazardous Air Pollutants		

2.3. Authority

This permit is issued in accordance with West Virginia Air Pollution Control Law W.Va. Code §§22-5-1 et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*

2.4. Term and Renewal

- 2.4.1. This permit supercedes and replaces previously issued Permit R13-2449H. This permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any applicable legislative rule.

2.5. Duty to Comply

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-2449H and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;
[45CSR§§13-5.11 and 13-10.3]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses and/or approvals from other agencies; i.e., local, state and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

2.6. Duty to Provide Information

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

2.7. Duty to Supplement and Correct Information

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

2.8. Administrative Update

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-4]

2.9. Permit Modification

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.

[45CSR§13-5.4.]

2.10. Major Permit Modification

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.

[45CSR§13-5.1]

2.11. Inspection and Entry

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

2.12. Emergency

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission

limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

- 2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.
- 2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - b. The permitted facility was at the time being properly operated;
 - c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and,
 - d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emission, and corrective actions taken.
- 2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
- 2.12.5. The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

2.13. Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

2.14. Suspension of Activities

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

2.15. Property Rights

This permit does not convey any property rights of any sort or any exclusive privilege.

2.16. Severability

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

2.17. Transferability

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1]

2.18. Notification Requirements

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

2.19. Credible Evidence

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association or public agency is prohibited except as noted in 45CSR§6-3.1.
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.
[40CFR§61.145(b) and 45CSR§34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.
[45CSR§4-3.1 State-Enforceable only.]
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45 C.S.R. 11.
[45CSR§11-5.2.]

3.2. Monitoring Requirements

[Reserved] **KEYBOARD**(May apply to some facilities; cases such as facility-wide monitoring requirements for fugitive emissions, etc.)

3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the

permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4 or 45CSR§13-5.4 as applicable.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
 1. The permit or rule evaluated, with the citation number and language;
 2. The result of the test for each permit or rule condition; and,
 3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports and notifications) required by this permit recorded in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.
- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.
[45CSR§4. *State-Enforceable only.*]

3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es) set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

If to the DAQ:

Director
WVDEP
Division of Air Quality
601 57th Street, SE
Charleston, WV 25304-2345

If to the USEPA:

Associate Director
Office of Air Enforcement and Compliance Assistance
(3AP20)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. Operating Fee.

3.5.4.1. In accordance with 45CSR22 – Air Quality Management Fee Program, the permittee shall not operate nor cause to operate the permitted facility or other associated facilities on the same or contiguous sites comprising the plant without first obtaining and having in current effect a Certificate to Operate (CTO). Such Certificate to Operate (CTO) shall be renewed annually, shall be maintained on the premises for which the certificate has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

4.0. Source-Specific Requirements

4.1. Limitations and Standards

- 4.1.1. In accordance with the information filed in Permit Application R13-2449C, its amendments, and any subsequent revisions thereto, the operations within the Wood Cutting Area, which includes all wood working and hand sanding activities, shall be limited to 3,744 hours on an annual basis. Compliance with the operation limit shall be determined using a 12-month rolling total. A 12-month rolling total shall mean the sum of the measured quantity at any given time for the previous twelve (12) consecutive calendar months.
- 4.1.2. In accordance with the information filed in Permit Application R13-2449C, its amendments, and any subsequent revisions thereto, the operations within the Finishing Area, which includes all spray booths and the Stroke Sander, shall be limited to 3,120 hours on an annual basis. Compliance with the operation limit shall be determined using a rolling yearly total. A rolling yearly total shall mean the sum of the measured quantity at any given time for the previous twelve (12) consecutive calendar months.
- 4.1.3. Two Day Model 124RF-10 fabric filter dust collectors, identified in permit application R13-2449C as 23C and 24C, shall be installed, maintained, and operated so as to achieve a design efficiency of 95% in the control of particulate matter emissions from any and all woodworking equipment and activities vented from the Wood Cutting Area. The particulate matter emission rate from each of the emission points, 23E and 24E, shall not exceed 0.1 pounds per hour or 0.1 tons per year.
- 4.1.4. The aggregate emission rate of Volatile Organic Compounds (VOCs) from the spray booths within the Finishing Area shall not exceed the following:

Emission Point ID	Description	pounds/hour	tons/year
1E, 2E, 4E, 5E, 6E, 8E	Old Finishing Room	95.5	99.3
12E, 3E, 13E1, 13E2, 14E1, 14E2, 15E1, 15E2, 19E and 20E	New Finishing Building		

Compliance with the annual emission limits shall be determined using a 12-month rolling total. A 12-month rolling total shall mean the sum of the measured quantity at any given time for the previous twelve (12) consecutive calendar months.

- 4.1.5. The aggregate emission rate, including any applicable control efficiencies, of Particulate Matter (PM) from the spray booths within the Finishing Area shall not exceed the following:

Emission Point ID	Description	pounds/hour	tons/year
1E, 2E, 4E, 5E, 6E, 8E	Old Finishing Room	1.0	0.7
12E, 3E, 13E1, 13E2, 14E1, 14E2, 15E1, 15E2, 19E and 20E	New Finishing Building		

Compliance with the annual emission limits shall be determined using a 12-month rolling total. A 12-month rolling total shall mean the sum of the measured quantity at any given time for the previous twelve (12) consecutive calendar months.

- 4.1.6. Spray Booth filters, 1C - 5C, 12C, 13C1, 13C2, 14C1 and 14C2, shall be installed, maintained, and operated so as to achieve a minimum efficiency of 97.5% in the control of particulate matter emissions from the spray booths 1S - 5S, 12S, 13S and 14S.
- 4.1.7. The Stroke Sander [11S] shall be located and operated in the Wood Cutting Area. The particulate matter emissions generated from the routine operation of this source shall be collected and vented through control devices 23C and 24C in accordance to the requirements set forth in 4.1.3.
- 4.1.8. The aggregate emission rate of Hazardous Air Pollutants (HAPs) from the spray booths within the Finishing Area shall not exceed the following:

Source ID	Description	pounds/hour	tons/year
1E, 2E, 4E, 5E, 6E, 8E	Old Finishing Room	18.7	19.4
12E, 3E, 13E1, 13E2, 14E1, 14E2, 15E1, 15E2, 19E and 20E	New Finishing Building		

Compliance with the annual emission limits shall be determined using a 12-month rolling total. A 12-month rolling total shall mean the sum of the measured quantity at any given time for the previous twelve (12) consecutive calendar months.

4.1.9. The facility-wide emission rate of the following HAPs shall not equal or exceed, on a per-HAP basis, ten (10) tons per year:

HAP	CAS Number	HAP	CAS Number
<ul style="list-style-type: none"> • Butyl Cellosolve • 2-Butoxy Ethanol • Ethylene Glycol Butyl Ether 	111762	<ul style="list-style-type: none"> • Methyl Isobutyl Ketone 	108101
<ul style="list-style-type: none"> • Cumene 	98828	<ul style="list-style-type: none"> • Methyl Methacrylate 	80626
<ul style="list-style-type: none"> • Dibutyl Phthalate 	84742	<ul style="list-style-type: none"> • Methylene Chloride 	75092
<ul style="list-style-type: none"> • Di Octyl Phthalate 	117840	<ul style="list-style-type: none"> • Naphthalene 	91203
<ul style="list-style-type: none"> • Di (2-ethylhexyl) Phthalate 	117817	<ul style="list-style-type: none"> • Phenol 	108952
<ul style="list-style-type: none"> • Ethylbenzene 	100414	<ul style="list-style-type: none"> • Styrene 	100425
<ul style="list-style-type: none"> • Manganese 	7439965	<ul style="list-style-type: none"> • Toluene 	108883
<ul style="list-style-type: none"> • Methanol 	67561	<ul style="list-style-type: none"> • Xylene 	1330207

Use of any surface coating containing any constituent identified in Section 112(b) of the 1990 Clean Air Act Amendments as a HAP and not listed above shall be in accordance with the following:

- a. The permittee shall notify the Secretary in writing of the surface coating to be used and the HAP(s) contained therein within thirty (30) days after the initial use of the surface coating. Additionally, an MSDS sheet for the surface coating shall be supplied at this time to the Secretary.
- b. The use of the surface coating shall be incorporated into the record keeping requirements contained herein.
- c. The emission rate of the HAP(s) contained within the surface coating shall not equal or exceed, on a per-HAP basis, ten (10) tons per year. Compliance with the annual emission limits shall be determined using a 12-month rolling total. A 12-month rolling total shall mean the sum of the measured quantity at any given time for the previous twelve (12) consecutive calendar months.

For the purposes of this permit, surface coatings shall be defined as a material applied onto, or impregnated into, a substrate for protective, decorative, or functional purposes. Such materials include, but are not limited to, stains, thinners, solvents, sealers, varnishes, paints, primers, catalysts,

acrylics, lacquers, and temporary protective coatings, or combinations of the above materials as applied.

- 4.1.10. The facility-wide emission rate of Formaldehyde (CAS No. 50000) shall not exceed 1,000 pounds per year. Compliance with the annual emission limit shall be determined using a 12-month rolling total. A 12-month rolling total shall mean the sum of the measured quantity at any given time for the previous twelve (12) consecutive calendar months.

Use of any surface coating containing any toxic air pollutant (TAP) as defined by West Virginia Legislative Rule 45CSR27, Section 2.10., other than Formaldehyde, shall be in accordance with the following:

- a. The permittee shall notify the Secretary in writing of the surface coating to be used and the TAP(s) contained therein within thirty (30) days of the use of the surface coating. Additionally, an MSDS sheet for the surface coating shall be supplied at this time to the Secretary.
 - b. The use of the surface coating shall be incorporated into the record keeping requirements contained herein.
 - c. The emission rate of the TAP(s) contained within the surface coating shall not equal or exceed, on a per-TAP basis, the annual limits contained in 45CSR27, Table A. Compliance with the annual emission limits shall be determined using rolling yearly totals.
- 4.1.11. The Air Makeup Units, identified as 9S, 10S, 16S, 17S, and 18S, shall be fueled by propane and limited to the following operating parameters:

Air Makeup Unit	Maximum Annual Operating Schedule (hours/year)	Maximum Propane Consumption (gallons/year)
9S	2,100	59,430
10S	2,100	59,430
16S	2,100	39,480
17S	2,100	39,480
18S	5,880	110,544

- 4.1.12. The Stain Dryer, identified as 8S, shall be limited to a maximum annual operating schedule of 3,120 hours per year and a maximum annual fuel consumption rate of 27,144 gallons of propane per year.
- 4.1.13. The Sealer/Lacquer Dryer, identified as 15S, shall be limited to a maximum annual operating schedule of 3,120 hours per year and a maximum annual fuel consumption rate of 50,856 gallons of propane per year.

- 4.1.14. The H. B. Smith Model CF-2300A boiler, identified in permit application R13-2449C as 21S, shall not exceed a total annual operating schedule of 5,880 hours per year. Maximum fuel consumption shall be limited to 185,220 gallons per year of #2 Fuel Oil.
- 4.1.15. The Mawera FU550 RIA “biomass boiler,” identified in permit application R13-2449H as 22S, shall burn only wood waste as a fuel and shall be operated no more that 5,880 hours per year (hr/yr).
- 4.1.16. The maximum heat input to the biomass boiler shall not exceed 2.26 MM Btu/hr. The maximum amount of wood waste burned in the biomass boiler shall not exceed 305 pounds per hour (lb/yr) and 1.79 MM lb/yr.
- 4.1.17. Except during startup, shutdown and malfunction, opacity from the biomass boiler (emission point 22E) shall not exceed 10 percent based on a six minute block average.
- 4.1.18. Emissions of carbon monoxide (CO), nitrogen oxides (NO_x), total particulate matter (PM), sulfur dioxide (SO₂), and volatile organic compounds (VOC) from the biomass boiler stack (Emission Point 22E) shall not exceed the following hourly and annual limitations:

Pollutant	Maximum Emission Rates	
	(lb/hr)	(ton/yr)
Carbon Monoxide (CO)	1.36	3.99
Nitrogen Oxide (NO _x)	1.11	3.26
Particulate Matter (PM)	0.95	2.79
Sulfur Dioxide (SO ₂)	0.06	0.17
Volatile Organic Compounds (VOC)	0.04	0.11

- 4.1.19. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.
[45CSR§13-5.11.]

4.2. Monitoring Requirements

- 4.2.1. For the purpose of determining compliance with permit limits based on 4.1.1. and 4.1.2., the permittee shall maintain records of the hours of operation of the Wood Cutting and Finishing Area using the sample record keeping format appended hereto as Attachment A. This information shall be maintained on-site for a period of no less than five (5) years and made available to the Secretary or his duly authorized representative upon request. At a time prior to being submitted to the Secretary, all records shall be certified and signed by a "Responsible Official" utilizing the attached Certification of Data Accuracy statement.

- 4.2.2. For the purpose of determining compliance with permit limits based on 4.1.3., the permittee shall maintain records of the operating performance and maintenance requirements of the Wood Cutting Area dust collectors using the sample record keeping format appended hereto as Attachment B(1) and B(2). This information shall be maintained on-site for a period of no less than five (5) years and made available to the Secretary or his duly authorized representative upon request. At a time prior to being submitted to the Secretary, all records shall be certified and signed by a "Responsible Official" utilizing the attached Certification of Data Accuracy statement.
- 4.2.3. For the purpose of determining compliance with permit requirements based on 4.1.6., the permittee shall maintain records of the filter replacements (1C - 5C, 12C, 13C1, 13C2, 14C1, and 14C2) and associated maintenance performed on the spray booths. This information shall be maintained on-site for a period of no less than five (5) years and made available to the Secretary or his duly authorized representative upon request. At a time prior to being submitted to the Secretary, all records shall be certified and signed by a "Responsible Official" utilizing the attached Certification of Data Accuracy statement.
- 4.2.4. For the purposes of determining compliance with the limits set forth in 4.1.4, 4.1.5., 4.1.8., 4.1.9. and 4.1.10., the permittee shall maintain records of the following:
- 4.2.4.1. The name and identification number of each surface coating, as applied; and
- 4.2.4.2. The mass of VOC, HAP, and solids per volume of each surface coating and the volume of each surface coating, as removed from inventory, used each month.

Additionally, within fifteen (15) days of the last day of each month, the permittee shall certify a summary report that contains the following information: hourly, monthly, and rolling yearly emission rates for VOCs, aggregate and speciated HAPs, and PM from each of the finishing areas as broken down in 4.1.4, A.5, and A.8. Said records shall be maintained on-site for a period of five (5) years and be made available to the Secretary or his/her duly authorized representative upon request.

- 4.2.5. For the purpose of determining compliance with permit limits based on 4.1.11., 4.1.12. and 4.1.13., the permittee shall maintain the following records using the sample record keeping format appended hereto as Attachment C: (1) the monthly hours of operation of the Air Makeup Units, identified as sources 9S, 10S, 16S, 17S, and 18S, and the Stain Dryer and the Sealer/Lacquer Dryer, identified as sources 8S and 15S, respectively; and (2) the total monthly propane consumption for sources 8S, 9S, 10S, 15S, 16S, 17S, and 18S. This information shall be maintained on-site for a period of no less than five (5) years and made available to the Secretary or his duly authorized representative upon request. At a time prior to being submitted to the Secretary, all records shall be certified and signed by a "Responsible Official" utilizing the attached Certification of Data Accuracy statement.
- 4.2.6. For the purpose of determining compliance with permit limits based on 4.1.14., 4.1.15., 4.1.16. and 4.1.18., the permittee shall maintain certified records of the operating schedule and fuel consumption (21S only) of the onsite boilers, identified as sources 21S and 22S, using the sample record keeping format appended hereto as Attachment D. This information shall be maintained on-site for a period of no less than five (5) years and made available to the Secretary or his duly authorized representative upon request. At a time prior to being submitted to the Secretary, all records shall be certified and signed by a "Responsible Official" utilizing the attached Certification of Data Accuracy statement.

4.3. Testing Requirements

- 4.3.1. If requested by the Secretary, compliance with the opacity limit given in 4.1.17. shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 22, or by installing and using a certified continuous opacity monitoring system. If any emissions are observed during Method 22 testing, the permittee shall immediately investigate the cause(s), take corrective action, and repeat the Method 22 test. If emissions are observed during the repeat test, the permittee shall perform testing in accordance with 40 CFR Part 60, Appendix A, Method 9 within 3 days.

4.4. Recordkeeping Requirements

- 4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:

- a. The date, place as defined in this permit and time of sampling or measurements;
- b. The date(s) analyses were performed;
- c. The company or entity that performed the analyses;
- d. The analytical techniques or methods used;
- e. The results of the analyses; and
- f. The operating conditions existing at the time of sampling or measurement.

- 4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.

- 4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:

- a. The equipment involved.
- b. Steps taken to minimize emissions during the event.
- c. The duration of the event.
- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.

- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

ATTACHMENT A
“Record of Operations”
 Caperton Furnitureworks, LLC - Berkeley Springs, WV
R13-2449I

Month _____ Year _____

Day	Wood Cutting Area (hours)	Finishing Area (hours)
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
29		
30		
31		
Monthly Total -	Hours	Hours
Cumulative 12-month Rolling Total -	Hours	Hours
Permitted Annual Total -	3,744 Hours	3,120 Hours

At a time prior to being submitted to the Secretary, all records shall be certified and signed by a “Responsible Official” utilizing the attached Certification of Data Accuracy statement.

ATTACHMENT B(1)
“Dust Collector Inspection and Maintenance Records”
 Caperton Furnitureworks, LLC - Berkeley Springs, WV
R13-2449I

Month _____ Year _____

<i>Day 124 RF-10 - Control Device [23C]</i>			
<i>Day</i>	<i>Pressure Drop Across Filter</i>	<i>Maintenance and Repair Records</i>	<i>Signature of Responsible</i>
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			
<i>Design Specs.</i>	<i>1 – 6</i>	<i>Document all operating deficiencies and failures, filter inspections and replacements, and routine maintenance.</i>	

At a time prior to being submitted to the Secretary, all records shall be certified and signed by a “Responsible Official” utilizing the attached Certification of Data Accuracy statement.

ATTACHMENT B(2)

“Dust Collector Inspection and Maintenance Records”
 Caperton Furnitureworks, LLC - Berkeley Springs, WV
R13-2449I

Month _____ Year _____

<i>Day 124 RF-10 - Control Device [24C]</i>			
<i>Day</i>	<i>Pressure Drop Across Filter</i>	<i>Maintenance and Repair Records</i>	<i>Signature of Responsible</i>
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			
<i>Design Specs.</i>	<i>1 – 6</i>	<i>Document all operating deficiencies and failures, filter inspections and replacements, and routine maintenance.</i>	

At a time prior to being submitted to the Secretary, all records shall be certified and signed by a “Responsible Official” utilizing the attached Certification of Data Accuracy statement.

ATTACHMENT C

*“Record of Operations – Air Makeup Units and Dryer Ovens”
 Caperton Furnitureworks, LLC - Berkeley Springs, WV
 R13-2449I*

Month _____ Year _____

Month	<i>Air Makeup Unit 9S (hours)</i>	<i>Air Makeup Unit 10S (hours)</i>	<i>Air Makeup Unit 16S (hours)</i>	<i>Air Makeup Unit 17S (hours)</i>	<i>Air Makeup Unit 18S (hours)</i>	<i>Stain Dryer 8S (hours)</i>	<i>Sealer/Lacquer Dryer 15S (hours)</i>	<i>Total Propane Usage (gallons)</i>
January								
February								
March								
April								
May								
June								
July								
August								
September								
October								
November								
December								
Cumulative Total for Year								
Permitted Annual Total	2,100 hours	2,100 hours	2,100 hours	2,100 hours	5,880 hours	3,120 hours	3,120 hours	386,364 gallons

T

The Certification of Data Accuracy statement on the reverse side of this form must be completed and signed by a Responsible Official or Authorized representative after the end of the calendar month. This certified records shall be maintained on-site for a period of five (5) years and be made available to the Chief or his or her representative upon request.

ATTACHMENT D "Record of Boiler Operations" Caperton Furnitureworks, LLC - Berkeley Springs, WV R13-2449I			
Month _____		Year _____	
Day	Finishing Area Boiler [21S]		Wood Cutting Area Boiler [22S]
	Hours of Operation (hours)	#2 Fuel Oil Usage (gallons)	Hours of Operation (hours)
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			
Total for Month			
Cumulative Total for Year			
Permitted Annual Total	5,880 Hours	116,130 gallons	5,880 Hours

The Certification of Data Accuracy statement on the reverse side of this form must be completed and signed by a Responsible Official or Authorized representative after the end of the calendar month. This certified records shall be maintained on-site for a period of five (5) years and be made available to the Chief or his or her representative upon request.

CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached _____, representing the period beginning _____ and ending _____, and any supporting documents appended hereto, is true, accurate, and complete.

Signature¹

(please use blue ink)

Responsible Official or Authorized Representative

Date

Name & Title

(please print or type)

Name

Title

Telephone No. _____

Fax No. _____

¹ This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
 - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of U.S. EPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.