West Virginia Department of Environmental Protection
Division of Air Quality

Joe Manchin, III
Governor

Randy C. Huffman
Cabinet Secretary

Permit to Operate

Pursuant to
Title V
of the Clean Air Act

Issued to:

American Woodmark Corporation
Hardy County Plant
R30-03100003-2010

John A. Benedict
Director

Issued: February 1, 2010 • Effective: February 15, 2010
Expiration: February 1, 2015 • Renewal Application Due: August 1, 2014

Permit Number: **R30-03100003-2010**
Permittee: **American Woodmark Corporation**
Facility Name: **Hardy County Plant**
Permittee Mailing Address: **390 Industrial Park Road, Moorefield, WV 26836**

This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§ 22-5-1 et seq.) and 45CSR30 — Requirements for Operating Permits. The permittee identified at the above-referenced facility is authorized to operate the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.

Facility Location: Moorefield, Hardy County, West Virginia
Facility Mailing Address: 390 Industrial Park Road, Moorefield, WV 26836
Telephone Number: (304) 530-1900
Type of Business Entity: Corporation
Facility Description: Manufacturer of wood kitchen cabinets
SIC Codes: 2434 - Lumber wood products except furniture
UTM Coordinates: 674.25 km Easting • 4,323.12 km Northing • Zone 17

Permit Writer: Jesse Hanshaw, P.E.

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.

Issuance of this Title V Operating Permit does not supersede or invalidate any existing permits under 45CSR13, 14 or 19, although all applicable requirements from such permits governing the facility's operation and compliance have been incorporated into the Title V Operating Permit.

Table of Contents

1.0 Emission Units and Active R13, R14, and R19 Permits

1.1. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
B1	B1	Boiler #1 (wood fired)	1987	13.3 MMBtu/hr	BC1
B3	B3	Boiler #3 (wood or #2 fuel oil fired)	1998	14.4 MMBtu/hr	BC3
WM-1	DC-1	Woodworking machinery and assembly operations (saws, drills, planers, routers, sanders, etc.) venting through the Mill Side bag house header *	1987	10,697 lb/hr Process Wt. Rate (PWR)	DC-1
WM-2	DC-2	Woodworking machinery same as source WM-1 above	1987	5,349 lb/hr PWR	DC-2
WM-4	DC-4	Woodworking machinery and assembly operations (saws, drills, planers, routers, sanders and Finishing line sanding, dusting, and denibbing machinery equipment) venting through the Paint Side bag house header **	1995	10,407 lb/hr PWR	DC-4
WM-5	DC-5	Woodworking machinery same as source WM-1 above	1998	6,097 lb/hr PWR	DC-5
WM-6	DC-6	Woodworking machinery same as source WM-4 above	2005	11,736 lb/hr PWR	DC-6
S1	BV1	Wood Dust Silo#1	1987	1,270 cfm	BV1
S2	BV2	Wood Dust Silo #2	1998	1,270 cfm	BV2
Line-1	Fugitive Inside Building Multiple Vent Points	Automatic Spray Finishing Line No. 1	1987	14,755 lb/hr PWR	VEN1
Line-2	Fugitive Inside Building Multiple Vent Points	Automatic Spray Finishing Line No. 2	1987	14,755 lb/hr PWR	VEN2
Line-4	Fugitive Inside Building Multiple Vent Points	Rollcoat Finishing Line No. 4	1995	5,171 lb/hr PWR	

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
F1	F1	Manual Spray Booth	1987	5,218 lb/hr PWR	F1
F2	F2	Manual Spray Booth	1987	5,218 lb/hr PWR	F2
F3	F3	Manual Spray Booth	1997	630 lb/hr PWR	F3

* Mill Side bag house header is common to bag houses DC-1, DC-2, DC-5
** Paint Side bag house header is common to bag houses DC-4 and DC-6.

1.2. Active R13, R14, and R19 Permits

The underlying authority for any conditions from R13, R14, and/or R19 permits contained in this operating permit is cited using the original permit number (e.g. R13-1234). The current applicable version of such permit(s) is listed below.

Permit Number	Date of Issuance
R13-2220D	**07/12/2005**
R13-1829A	**03/26/2004**
R14-0002	**11/14/1986**

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 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary's designated representative for the purposes of this permit.

2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to a "rolling yearly total" shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months

2.2. Acronyms

CAAA	Clean Air Act Amendments		Hour
CBI	Confidential Business Information	**NA *or* N/A**	Not Applicable
CEM	Continuous Emission Monitor	**NAAQS**	National Ambient Air Quality Standards
CES	Certified Emission Statement		
C.F.R. *or* CFR	Code of Federal Regulations	**NESHAPS**	National Emissions Standards for Hazardous Air Pollutants
CO	Carbon Monoxide		
C.S.R. *or* CSR	Codes of State Rules	**NO_x**	Nitrogen Oxides
DAQ	Division of Air Quality	**NSPS**	New Source Performance Standards
DEP	Department of Environmental Protection	**PM**	Particulate Matter
FOIA	Freedom of Information Act	**PM_{10}**	Particulate Matter less than 10µm in diameter
HAP	Hazardous Air Pollutant		
HON	Hazardous Organic NESHAP	**pph**	Pounds per Hour
HP	Horsepower	**ppm**	Parts per Million
lbs/hr	Pounds per Hour	**PSD**	Prevention of Significant Deterioration
LDAR	Leak Detection and Repair		
m	Thousand	**psi**	Pounds per Square Inch
MACT	Maximum Achievable Control Technology	**SIC**	Standard Industrial Classification
mm	Million	**SIP**	State Implementation Plan
mmBtu/hr	Million British Thermal Units per Hour	**SO_2**	Sulfur Dioxide
		TAP	Toxic Air Pollutant
$mmft^3/hr$	Million Cubic Feet Burned per		

TPY	Tons per Year	**UTM**	Universal Transverse Mercator
TRS	Total Reduced Sulfur	**VEE**	Visual Emissions Evaluation
TSP	Total Suspended Particulate	**VOC**	Volatile Organic Compounds
USEPA	United States Environmental Protection Agency		

2.3. Permit Expiration and Renewal

2.3.1. Permit duration. This permit is issued for a fixed term of five (5) years and shall expire on the date specified on the cover of this permit, except as provided in 45CSR§30-6.3.b. and 45CSR§30-6.3.c.
[45CSR§30-5.1.b.]

2.3.2. A permit renewal application is timely if it is submitted at least six (6) months prior to the date of permit expiration.
[45CSR§30-4.1.a.3.]

2.3.3. Permit expiration terminates the source's right to operate unless a timely and complete renewal application has been submitted consistent with 45CSR§30-6.2. and 45CSR§30-4.1.a.3.
[45CSR§30-6.3.b.]

2.3.4. If the Secretary fails to take final action to deny or approve a timely and complete permit application before the end of the term of the previous permit, the permit shall not expire until the renewal permit has been issued or denied, and any permit shield granted for the permit shall continue in effect during that time.
[45CSR§30-6.3.c.]

2.4. Permit Actions

2.4.1. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
[45CSR§30-5.1.f.3.]

2.5. Reopening for Cause

2.5.1. This permit shall be reopened and revised under any of the following circumstances:

a. Additional applicable requirements under the Clean Air Act or the Secretary's legislative rules become applicable to a major source with a remaining permit term of three (3) or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 45CSR§§30-6.6.a.1.A. or B.

b. Additional requirements (including excess emissions requirements) become applicable to an affected source under Title IV of the Clean Air Act (Acid Deposition Control) or other legislative rules of the Secretary. Upon approval by U.S. EPA, excess emissions offset plans shall be incorporated into the permit.

c. The Secretary or U.S. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

d. The Secretary or U.S. EPA determines that the permit must be revised or revoked and reissued to assure compliance with the applicable requirements.

[45CSR§30-6.6.a.]

2.6. Administrative Permit Amendments

2.6.1. The permittee may request an administrative permit amendment as defined in and according to the procedures specified in 45CSR§30-6.4.
[45CSR§30-6.4.]

2.7. Minor Permit Modifications

2.7.1. The permittee may request a minor permit modification as defined in and according to the procedures specified in 45CSR§30-6.5.a.
[45CSR§30-6.5.a.]

2.8. Significant Permit Modification

2.8.1. The permittee may request a significant permit modification, in accordance with 45CSR§30-6.5.b., for permit modifications that do not qualify for minor permit modifications or as administrative amendments.
[45CSR§30-6.5.b.]

2.9. Emissions Trading

2.9.1. No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit and that are in accordance with all applicable requirements.
[45CSR§30-5.1.h.]

2.10. Off-Permit Changes

2.10.1. Except as provided below, a facility may make any change in its operations or emissions that is not addressed nor prohibited in its permit and which is not considered to be construction nor modification under any rule promulgated by the Secretary without obtaining an amendment or modification of its permit. Such changes shall be subject to the following requirements and restrictions:

a. The change must meet all applicable requirements and may not violate any existing permit term or condition.

b. The permittee must provide a written notice of the change to the Secretary and to U.S. EPA within two (2) business days following the date of the change. Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield.

d. The permittee shall keep records describing all changes made at the source that result in emissions of regulated air pollutants, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. No permittee may make any change subject to any requirement under Title IV of the Clean Air Act (Acid Deposition Control) pursuant to the provisions of 45CSR§30-5.9.

f. No permittee may make any changes which would require preconstruction review under any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) pursuant to the provisions of 45CSR§30-5.9.

[45CSR§30-5.9]

2.11. Operational Flexibility

2.11.1. The permittee may make changes within the facility as provided by § 502(b)(10) of the Clean Air Act. Such operational flexibility shall be provided in the permit in conformance with the permit application and applicable requirements. No such changes shall be a modification under any rule or any provision of Title I of the Clean Air Act (including 45CSR14 and 45CSR19) promulgated by the Secretary in accordance with Title I of the Clean Air Act and the change shall not result in a level of emissions exceeding the emissions allowable under the permit.
[45CSR§30-5.8]

2.11.2. Before making a change under 45CSR§30-5.8., the permittee shall provide advance written notice to the Secretary and to U.S. EPA, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall thereafter maintain a copy of the notice with the permit, and the Secretary shall place a copy with the permit in the public file. The written notice shall be provided to the Secretary and U.S. EPA at least seven (7) days prior to the date that the change is to be made, except that this period may be shortened or eliminated as necessary for a change that must be implemented more quickly to address unanticipated conditions posing a significant health, safety, or environmental hazard. If less than seven (7) days notice is provided because of a need to respond more quickly to such unanticipated conditions, the permittee shall provide notice to the Secretary and U.S. EPA as soon as possible after learning of the need to make the change.
[45CSR§30-5.8.a.]

2.11.3. The permit shield shall not apply to changes made under 45CSR§30-5.8., except those provided for in 45CSR§30-5.8.d. However, the protection of the permit shield will continue to apply to operations and emissions that are not affected by the change, provided that the permittee complies with the terms and conditions of the permit applicable to such operations and emissions. The permit shield may be reinstated for emissions and operations affected by the change:

a. If subsequent changes cause the facility's operations and emissions to revert to those authorized in the permit and the permittee resumes compliance with the terms and conditions of the permit, or

b. If the permittee obtains final approval of a significant modification to the permit to incorporate the change in the permit.

[45CSR§30-5.8.c.]

2.11.4. "Section 502(b)(10) changes" are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements. **[45CSR§30-2.39]**

2.12. Reasonably Anticipated Operating Scenarios

2.12.1. The following are terms and conditions for reasonably anticipated operating scenarios identified in this permit.

a. Contemporaneously with making a change from one operating scenario to another, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating and to document the change in reports submitted pursuant to the terms of this permit and 45CSR30.

b. The permit shield shall extend to all terms and conditions under each such operating scenario; and

c. The terms and conditions of each such alternative scenario shall meet all applicable requirements and the requirements of 45CSR30.

[45CSR§30-5.1.i.]

2.13. Duty to Comply

2.13.1. 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; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.
[45CSR§30-5.1.f.1.]

2.14. Inspection and Entry

2.14.1. 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.

[45CSR§30-5.3.b.]

2.15. Schedule of Compliance

2.15.1. For sources subject to a compliance schedule, certified progress reports shall be submitted consistent with the applicable schedule of compliance set forth in this permit and 45CSR§30-4.3.h., but at least every six (6) months, and no greater than once a month, and shall include the following:

a. Dates for achieving the activities, milestones, or compliance required in the schedule of compliance, and dates when such activities, milestones or compliance were achieved; and

b. An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measure adopted.

[45CSR§30-5.3.d.]

2.16. Need to Halt or Reduce Activity not a Defense

2.16.1. It shall not be a defense for a permittee in an enforcement action that it would 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.
[45CSR§30-5.1.f.2.]

2.17. Emergency

2.17.1. An "emergency" means any situation arising from sudden and reasonably 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.
[45CSR§30-5.7.a.]

2.17.2. 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 45CSR§30-5.7.c. are met.
[45CSR§30-5.7.b.]

2.17.3. 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. Subject to the requirements of 45CSR§30-5.1.c.3.C.1, 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, report, and variance request fulfills the requirement of 45CSR§30-5.1.c.3.B. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

[45CSR§30-5.7.c.]

2.17.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.
[45CSR§30-5.7.d.]

2.17.5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.
[45CSR§30-5.7.e.]

2.18. Federally-Enforceable Requirements

2.18.1. All terms and conditions in this permit, including any provisions designed to limit a source's potential to emit and excepting those provisions that are specifically designated in the permit as "State-enforceable only", are enforceable by the Secretary, USEPA, and citizens under the Clean Air Act.
[45CSR§30-5.2.a.]

2.18.2. Those provisions specifically designated in the permit as "State-enforceable only" shall become "Federally-enforceable" requirements upon SIP approval by the USEPA.

2.19. Duty to Provide Information

2.19.1. 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 modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records required 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.
[45CSR§30-5.1.f.5.]

2.20. Duty to Supplement and Correct Information

2.20.1. 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.
[45CSR§30-4.2.]

2.21. Permit Shield

2.21.1. Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that such applicable requirements are included and are specifically identified in this permit or the Secretary has determined that other requirements specifically identified are not applicable to the source and this permit includes such a determination or a concise summary thereof.
[45CSR§30-5.6.a.]

2.21.2. Nothing in this permit shall alter or affect the following:

a. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance; or

b. The applicable requirements of the Code of West Virginia and Title IV of the Clean Air Act (Acid Deposition Control), consistent with § 408 (a) of the Clean Air Act.

c. The authority of the Administrator of U.S. EPA to require information under § 114 of the Clean Air Act or to issue emergency orders under § 303 of the Clean Air Act.

[45CSR§30-5.6.c.]

2.22. Credible Evidence

2.22.1. 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 defenses otherwise available to the permittee including but not limited to any challenge to the credible evidence rule in the context of any future proceeding.
[45CSR§30-5.3.e.3.B. and 45CSR38]

2.23. Severability

2.23.1. The provisions of this permit are severable. If any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid by a court of competent jurisdiction, the remaining permit terms and conditions or their application to other circumstances shall remain in full force and effect.
[45CSR§30-5.1.e.]

2.24. Property Rights

2.24.1. This permit does not convey any property rights of any sort or any exclusive privilege.
[45CSR§30-5.1.f.4]

2.25. Acid Deposition Control

2.25.1. Emissions shall not exceed any allowances that the source lawfully holds under Title IV of the Clean Air Act (Acid Deposition Control) or rules of the Secretary promulgated thereunder.

a. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid deposition control program, provided that such increases do not require a permit revision under any other applicable requirement.

b. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement.

c. Any such allowance shall be accounted for according to the procedures established in rules promulgated under Title IV of the Clean Air Act.

[45CSR§30-5.1.d.]

2.25.2. Where applicable requirements of the Clean Air Act are more stringent than any applicable requirement of regulations promulgated under Title IV of the Clean Air Act (Acid Deposition Control), both provisions shall be incorporated into the permit and shall be enforceable by the Secretary and U. S. EPA.
[45CSR§30-5.1.a.2.]

3.0. Facility-Wide Requirements

3.1. Limitations and Standards

3.1.1. **Open burning.** The open burning of refuse by any person 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 or allow 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 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.
[40 C.F.R. 61 and 45CSR34]

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. **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 45CSR11.
[45CSR§11-5.2]

3.1.6. **Emission inventory.** The permittee is responsible for submitting, on an annual basis, an emission inventory in accordance with the submittal requirements of the Division of Air Quality.
[W.Va. Code § 22-5-4(a)(14)]

3.1.7. **Ozone-depleting substances.** For those facilities performing maintenance, service, repair or disposal of appliances, the permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 C.F.R. Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:

a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the prohibitions and required practices pursuant to 40 C.F.R. §§ 82.154 and 82.156.

b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 C.F.R. § 82.158.

c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 C.F.R. § 82.161.

[40 C.F.R. 82, Subpart F]

3.1.8. Risk Management Plan. Should this stationary source, as defined in 40 C.F.R. § 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 C.F.R. § 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 C.F.R. Part 70 or 71.
[40 C.F.R. 68]

3.1.9 If US EPA has not already promulgated a standard pursuant to 40 C.F.R. 63 for industrial, commercial, institutional boilers and process heaters, the facility shall submit a Part 1 112(j) "equivalent emission limitation by permit" application for case-by-case MACT determination, containing the information required in 40 C.F.R. §63.53(a), within thirty (30) days of the date for a final rule specified in the final order of the United States District Court for the District of Columbia, which is currently December 16, 2010. The Part 1 112(j) application shall identify each affected unit, and address HAP emissions from each of the boilers and process heaters. If the facility determines there are no affected units (boilers or process heaters), a statement of non-applicability must be submitted in lieu of a Part 1 application. A Part 2 112(j) "equivalent emission limitation by permit" application for case-by-case MACT determination containing information required in 40 C.F.R. §63.53(b) is due within 60 days of the Part 1 112(j) application submittal. All 112(j) "equivalent emission limitation by permit" applications must be submitted to both WVDEP-Division of Air Quality, and Chief of Permits and Technical Branch, US EPA Region III, Mail Code 3AP11, 1650 Arch Street, Philadelphia, PA, 19103-2029.

[45CSR34, 40 C.F.R. §63.52]

3.1.10. Control of Fugitive Particulate Matter. All ash or fuel handling systems including stockpiles, open or enclosed, as well as transportation activities are required to operate and maintain a fugitive control system to minimize these emissions.
[45CSR§2-5]

3.1.11. *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., 45CSR13, Permit No. R13-2220 - (condition 4.1.15), Equipment ID (BC3, BV2, F3, DC-5, DC-6)]

3.2. Monitoring Requirements

3.2.1. N/A

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, if applicable, in accordance with the Secretary's delegated authority and any established equivalency determination methods which are 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.

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.

[WV Code § 22-5-4(a)(15) and 45CSR13]

3.4. Recordkeeping Requirements

3.4.1. **Monitoring information.** 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.

[45CSR§30-5.1.c.2.A.]

3.4.2. **Retention of records.** The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of monitoring sample, measurement, report, application, or record creation date. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Where appropriate, records may be maintained in computerized form in lieu of the above records.
[45CSR§30-5.1.c.2.B.]

3.4.3. **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§30-5.1.c. State-Enforceable only.]

3.4.4. *Record of Maintenance of Air Pollution Control Equipment.* For all pollution control equipment listed in Section1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
[45CSR13, Permit No. R13-2220 - (condition 4.4.2.), Equipment ID (BC3, BV2, F3, DC-5, DC-6)]

3.4.5. *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.

[45CSR13, Permit No. R13-2220 - (condition 4.4.3.), Equipment ID (BC3, BV2, F3, DC-5, DC-6)]

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.
[45CSR§30-4.4. *and* 5.1.c.3.D.]

3.5.2. A permittee may request confidential treatment for the submission of reporting required under 45CSR§30-5.1.c.3. pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31. **[45CSR§30-5.1.c.3.E.]**

3.5.3. Except in the case of the electronic submittal requirements in 3.5.5, 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, mailed first class, or by private carrier 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

Phone: 304/926-0475
FAX: 304/926-0478

If to the US EPA:

Associate Director
Office of Enforcement and Permits Review
(3AP12)
U. S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

3.5.4. **Certified emissions statement.** The permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. **[45CSR§30-8.]**

3.5.5. **Compliance certification.** The permittee shall certify compliance with the conditions of this permit on the forms provided by the DAQ. In addition to the annual compliance certification, the permittee may be required to submit certifications more frequently under an applicable requirement of this permit. The annual certification shall be submitted to the DAQ and USEPA on or before March 15 of each year, and shall certify compliance for the period ending December 31. The annual certification submitted to USEPA shall be forwarded by email only to: R3_APD_Permits@epa.gov. The permittee shall maintain a copy of the certification on site for five (5) years from submittal of the certification. **[45CSR§30-5.3.e.]**

3.5.6. **Semi-annual monitoring reports.** The permittee shall submit reports of any required monitoring on or before September 15 for the reporting period January 1 to June 30 and on or before March 15 for the reporting period July 1 to December 31. All instances of deviation from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with 45CSR§30-4.4. **[45CSR§30-5.1.c.3.A.]**

3.5.7. **Emergencies.** For reporting emergency situations, refer to Section 2.17 of this permit.

3.5.8. **Deviations.**

a. In addition to monitoring reports required by this permit, the permittee shall promptly submit supplemental reports and notices in accordance with the following:

1. Any deviation resulting from an emergency or upset condition, as defined in 45CSR§30-5.7., shall be

reported by telephone or telefax within one (1) working day of the date on which the permittee becomes aware of the deviation, if the permittee desires to assert the affirmative defense in accordance with 45CSR§30-5.7. A written report of such deviation, which shall include the probable cause of such deviations, and any corrective actions or preventative measures taken, shall be submitted and certified by a responsible official within ten (10) days of the deviation.

2. Any deviation that poses an imminent and substantial danger to public health, safety, or the environment shall be reported to the Secretary immediately by telephone or telefax. A written report of such deviation, which shall include the probable cause of such deviation, and any corrective actions or preventative measures taken, shall be submitted by the responsible official within ten (10) days of the deviation.

3. Deviations for which more frequent reporting is required under this permit shall be reported on the more frequent basis.

4. All reports of deviations shall identify the probable cause of the deviation and any corrective actions or preventative measures taken.

[45CSR§30-5.1.c.3.C.]

b. The permittee shall, in the reporting of deviations from permit requirements, including those attributable to upset conditions as defined in this permit, report the probable cause of such deviations and any corrective actions or preventive measures taken in accordance with any rules of the Secretary.

[45CSR§30-5.1.c.3.B.]

3.5.9. **New applicable requirements.** If any applicable requirement is promulgated during the term of this permit, the permittee will meet such requirements on a timely basis, or in accordance with a more detailed schedule if required by the applicable requirement.
[45CSR§30-4.3.h.1.B.]

3.6. Compliance Plan

3.6.1. N/A

3.7. Permit Shield

3.7.1. The permittee is hereby granted a permit shield in accordance with 45CSR§30-5.6. The permit shield applies provided the permittee operates in accordance with the information contained within this permit.

3.7.2. The following requirements specifically identified are not applicable to the source based on the determinations set forth below. The permit shield shall apply to the following requirements provided the conditions of the determinations are met.

a. 40 C.F.R. 60 Subparts K, Ka, Kb —Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978; prior to July 23, 1984; or after July 23, 1984 respectively.

Regardless of the construction date these NSPS standards have an applicability threshold of either 40,000 or 20,000 gallons in which American Woodmark Corporation does not satisfy. The Company's largest volatile organic liquid tank is less than 10,000 gallons. Therefore, the above referenced NSPS for tanks are not applicable to the facility permitted herein.

b. 40 C.F.R. 60 Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. American Woodmark operates two boilers less than 15 MM Btu/hr. Boiler B3, the newest of the two, was constructed in 1998, after 1989, which satisfies the first applicability criteria for this NSPS. The other is a design capacity between 10 and 100 MM Btu/hr. Therefore boiler B3 is subject to this standard. However, as a result of an exemption for boilers less than 30 MM Btu/hr provided by 40 C.F.R. §60.63c.b. the PM emission standards do not apply to boiler B3. Additionally this boiler is not subject to any specific SO2 standards defined by the Regulation while utilizing wood as fuel type. However, when #2 fuel oil is used in the B3 boiler, compliance with this standard shall be demonstrated by obtaining a certified report from the fuel supplier for each shipment that indicates less than 0.3 weight percent sulfur. A copy of each certified report from the fuel supplier shall be submitted to the Director and to USEPA in accordance with 40 C.F.R. §60.42c (h) and 40 C.F.R. §60.48c (f)

   Boiler B1 was constructed in 1987, which is prior to the June 9, 1989 applicability date of NSPS Subpart Dc. Therefore boiler B1 was found to be not subject to NSPS Subpart Dc

c. 40 C.F.R. 60 Subpart Db—Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

   The second boiler incorporated by this permit was constructed in 1987 and is designated as B1. As a result of the construction date, after 1984, this boiler satisfies the first half of the applicability criteria. However, having a design capacity less than 100 MM Btu/hr does not satisfy the second part of the applicability criteria. Therefore, due to the logic stated above, boiler B1 was found not to be subject to any requirements of the NSPS Subpart Db.

d. 45CSR10 Section 4 - Standards for Manufacturing Process Source Operations.

   Section 5 - Combustion of Refinery or Process Gas Streams

   American Woodmark’s cabinet manufacturing facility does not operate any manufacturing source operations or combust refinery and/or process gas streams as defined by this rule. Therefore, they are exempt from the requirements of the sections referenced above.List requirement, title and reason why shield applies.

4.0. Source-Specific Requirements for Boilers B1 and B3, Emission Point ID's B1 and B3.

4.1. Limitations and Standards

4.1.1. Air pollutant emissions from the wood fired boiler designated as B1 shall not exceed the following limitations:

Pollutant	lb/hr	tons/yr
Particulate matter	3.4	15
Sulfur Dioxide	8.6	38
Nitrogen Oxides	8.2	36
Carbon Monoxide	8.6	38
VOC	3.8	17

The 45CSR10 SO2 emission limit for the B1 boiler is streamlined by demonstrating compliance with the 8.6 lb/hr SO2 limit established by 45CSR14 in Permit No. R14-0002 (Condition A.4.) and thus this Title V Standard Limitation, 4.1.1. The sulfur dioxide emission limit for the 13.3 MMBtu/hr boiler (emission point B1) is defined by 45CSR10 as 42.56 lbs SO2/hr.

Compliance with the particulate weight standard of 3.32 (lb PM/hr) (45CSR§2-4.1.c) incorporated by the Title V permit as Standard Limitation 4.1.11. shall streamline compliance with the 3.4 (lb/hr) PM requirement of 45CSR14, Permit No. R14-0002, (condition A.4.), and thus the PM requirements of Standard Limitation 4.1.1. Therefore, compliance with Standard Limitation 4.1.11. of this Title V permit will assure compliance with the applicable weight rate PM standard of 45CSR2.

[45CSR14, Permit No. R14-0002 - (condition A.4.), Equipment ID (B1)]

4.1.2. The Hurst Boiler & Welding Co., Model H-1950-150 WF, 14.4 MMBtu/hr wood waste-fired boiler (with an oil-fired backup burner), designated as B3, shall use only wood waste or #2 Fuel Oil as fuel. Alternative fuels may be used only after receiving prior written approval from the Director.

[45CSR13, Permit No. R13-2220 - (condition 4.1.3.), Equipment ID (B3)]

4.1.3. The hourly and annual throughput of wood waste, which includes the as-received moisture, into the Hurst Boiler & Welding Co., Model H-1950-150 WF, 14.4 MMBtu/hr wood waste-fired boiler, designated as B3, shall not exceed 2,060 pounds per hour or 9,023 tons per year, respectively. Compliance with the wood waste throughput limit shall be determined using a rolling yearly total. A rolling yearly total shall mean the sum of the throughput at any given time for the previous twelve (12) consecutive months.

[45CSR13, Permit No. R13-2220 - (condition 4.1.1.), Equipment ID (B3)]

4.1.4. The hourly and annual throughput of #2 Fuel Oil into the Hurst Boiler & Welding Co., Model H-1950-150 WF, 14.4 MMBtu/hr oil-fired back-up burner, designated as B3, shall not exceed 107 gallons per hour nor 937,320

gallons per year, respectively. Compliance with the #2 Fuel Oil throughput limit shall be determined using a rolling yearly total.

[45CSR13, Permit No. R13-2220 - (condition 4.1.2.), Equipment ID (B3)]

4.1.5. No.2 Fuel Oil burned in the boiler designated as B3 shall not contain greater than 0.3 weight percent sulfur.

The owner or operator shall, pursuant to 40 CFR 60, Subpart Dc, Sections 60.48c(e) and (f), submit a certified report from the fuel supplier that shows compliance with this requirement.

Compliance with the R13-2220D (condition 4.1.5.) 0.3 weight percent sulfur standard for the B3 boiler burning No. 2 Fuel Oil is streamlined with the 0.5 weight percent sulfur standard for No.2 Fuel Oil of NSPS Subpart Dc 60.42c(d). Therefore, compliance with the permit limit will also assure compliance with the applicable weight percent sulfur standard for No.2 Fuel Oil of NSPS Subpart Dc.

[45CSR13, Permit No. R13-2220 - (condition 4.1.5.), Equipment ID (B3)]

4.1.6. Pursuant to 45CSR2, Section 3.1, the emission of smoke and/or particulate matter into the open air from the Hurst Boiler & Welding Co., Model H-1950-150 WF, 14.4 MMBtu/hr and 13.3 MMBtu/hr boilers, designated as B3 and B1 respectively shall not exceed, in shade or appearance, ten (10) percent opacity.

[45CSR13, Permit No. R13-2220 - (condition 4.1.6.), Equipment ID (B3)]

[45CSR§2-3.1, Emission Point IDs (B3 and B1)]

4.1.7. The Hurst Boiler & Welding Co., Model H-1950-150 WF, 14.4 MMBtu/hr wood waste-fired boiler (B3), shall be equipped with a multiclone mechanical collector, identified as DB3, for control of particulate matter emissions. Exhaust from the boiler shall at all times be routed through the multiclone. The multiclone shall be installed, maintained, and operated so as to achieve a minimum design efficiency of 80% in the collection of particulate matter.

[45CSR13, Permit No. R13-2220 (condition 4.1.7.), Equipment ID (B3)]

4.1.8. When combusting wood-waste, emissions from the 14.4 MMBtu/hr, Hurst Boiler & Welding Co., Model H-1950-150 WF, identified as emission point B3, shall not exceed the following limits:

Pollutant	lbs/hr	tons/year
Carbon Monoxide (CO)	14.75	64.61
Oxides of Nitrogen (NO_x)	2.66	10.85
Particulate Matter <10um (PM_{10})	2.59	11.35
Sulfur Dioxide (SO_2)	0.15	0.68
Total Suspended Particulate (TSP)	3.60	14.25
Volatile Organic Compounds (VOCs)	0.23	0.99

The 45CSR10 SO2 emission limit for the boiler designated as B3 is streamlined by demonstrating compliance with the 0.15 lb/hr SO2 emission limit established by 45CSR13, in Permit No. R13-2220D (Condition 4.1.9.) for burning wood waste. The 14.4 MM Btu/hr boiler (emission point B3) was found to be subject to a 45CSR10 individual stack specific SO2 emission limit of 46.08 lb/hr SO2.

[45CSR13, Permit No. R13-2220 (condition 4.1.9.), 45CSR§2-4.1.c., Equipment ID (B3)]

4.1.9. When combusting distillate oil, emissions from the Hurst Boiler & Welding Co., Model H-1950-150 WF, identified as emission point B3, shall not exceed the following limits:

Pollutant	lbs/hr	tons/year
Carbon Monoxide (CO)	0.54	2.34
Oxides of Nitrogen (NO_x)	2.14	9.37
Particulate Matter <10um (PM_{10})	0.11	0.47
Sulfur Dioxide (SO_2)	4.56	19.96
Total Suspended Particulate (TSP)	0.21	0.94
Volatile Organic Compounds (VOCs)	0.27	1.17

Compliance with the 45CSR2 PM standard for the B3 boiler burning #2 fuel oil is defined in 45CSR§2.4.1.b. as 1.30 (lb/hr) PM is streamlined with the 0.21 (lb/hr) PM requirement of 45CSR13, Permit No. R13-2220D - (condition 4.1.10.), and thus Standard Limitation 4.1.9 of the Title V Permit pertaining to Boiler ID (B3)**.** Therefore, compliance with the permit limit will also assure compliance with the applicable particulate matter standard of 45CSR2.

The 14.4 MM Btu/hr boiler (emission point B3) has an individual stack specific SO2 emission limit of 46.08 lb/hr SO2 according to 45CSR10. The 45CSR10 SO2 emission limit for the B3 boiler is streamlined by demonstrating compliance with the 4.56 lb/hr SO2 emission limit established by 45CSR13, in Permit No. R13-2220D (Condition 4.1.10) pertaining to burning #2 fuel oil.

[45CSR13, Permit No. R13-2220 (condition 4.1.10.), Equipment ID (B3)]

4.1.10. Reserved

4.1.11. The 13.3 MMBtu/hr boiler designated as B1 shall not exceed 3.32 lb/hr of PM.

Compliance with the 45CSR2 PM standard for the B1 boiler utilizing wood waste as defined in 4.1.11. above shall streamline compliance with the 3.4 (lb/hr) PM requirement of 45CSR14, Permit No. R14-0002 (condition A.4.), and thus Standard Limitation 4.1.1. of this permit.

[45CSR§2-4.1, Emission Point ID (B1)]

4.1.12. The visible emission standards set forth in 45CSR§2-3, and thus 4.1.6. of this permit, shall apply at all times except in periods of start-up, shutdown and malfunctions. Where the Director believes that start-ups and shutdowns are excessive in duration and/or frequency, the Director may require an owner or operator to provide

a written report demonstrating that such frequent start-ups and shutdowns are necessary.

At all times, including periods of start-ups, shutdowns and malfunctions, owners and operators shall, to the extent practicable, maintain and operate any fuel burning unit(s) including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, visible emission observations, review of operating and maintenance procedures and inspection of the source.

[45CSR§2-9.1., 45CSR§2-9.2., Equipment ID (B1, B3)]

4.2. Monitoring Requirements

4.2.1. Opacity Compliance checks once per month for Boiler stacks (B1 and B3).

Visual emission checks of each emission point subject to an opacity limit shall be conducted monthly. These checks shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the emission point has visible emissions using procedures outlined in 40 C.F.R. 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 40C.F.R.60, Appendix A, Method 9 evaluation within three (3) days unless the permittee can demonstrate a valid reason that the time frame should be extended. A Method 9 evaluation shall not be required if the visible emission condition is corrected within 24 hours and the emission source is operated at normal operating conditions.

[45CSR§30-5.1.c., Emission Point ID (B1, B3)]

4.2.2. The permittee shall maintain records indicating the operating schedule, quantity of fuel combusted by fuel type, and fuel quality analysis parameters. Records shall be maintained on site. Specific records to be maintained by fuel type are as follows:

Fuel Type	Recordkeeping Parameters
Wood	1. Date/time of startups and shutdowns. 2. Quantity burned per day. . Ash and BTU analysis
Fuel Oil	• Date/time of startups and shutdowns. • Quantity burned per day. • BTU analysis for each shipment. • Sulfur weight percent analysis for each shipment.

[45CSR§30-5.1.c., 45CSR§2-8.3.c., 45CSR§2A-7.1.a., 45CSR2A Boiler Registration (4/3/01), Emission Point IDs (B1, B3)]

4.2.3. The permittee shall maintain monthly summaries of the quantity of each fuel type combusted in the B1 and B3 boilers on a pounds per hour basis, as well as maintain a rolling annual sum of the total quantity combusted during the prior twelve month period.

[45CSR§30-5.1.c., Emission Point IDs (B1, B3)]

4.2.4 The permittee shall maintain monthly records indicating the emission calculations and results used to demonstrate compliance with all point source emission limits pertaining to boilers B1 and B3. When available, site specific emission factors derived from performance testing shall be incorporated into the compliance demonstration. Prior to developing site specific emission factors the permittee can opt to use emission factors provided by the boiler manufacturer or current AP-42 factors. Since there are no stack testing provisions for SO2 and VOC, these pollutants will continue to demonstrate compliance by utilizing AP-42 factors for small wood fired boilers or emission factors provided by the boiler manufacturer. The Division of Air Quality may specify or may approve other valid methods for compliance determination when deemed appropriate and necessary. These records shall be maintained on site.

[45CSR§30-5.1.c., Emission Point IDs (B1, B3)]

4.2.5. In order to ensure proper operation of the boiler cyclones the permittee shall conduct an annual preventative maintenance inspection/cleaning/refurbishment, as appropriate, of the housing, connections, and dust hoppers pertaining to the multiclones servicing emission points B1 and B3,. Records shall be maintained on site stating the date and time of each multiclone's annual preventative maintenance activity, the results of the annual preventative maintenance activity and, if appropriate, all corrective actions taken.

[45CSR§30-5.1.c., Emission Point IDs. (B1, B3)]

4.2.6. The owner or operator of a fuel burning unit(s) subject to 45CSR2 shall report to the Director any malfunction of such unit or its air pollution control equipment which results in any excess particulate matter emission rate or excess opacity as provided in one of the following subdivisions:

a. Excess opacity periods meeting the following conditions may be reported on a quarterly basis unless otherwise required by the Director:

1. The excess opacity period does not exceed thirty (30) minutes within any 24-hour period; and
2. Excess opacity does not exceed 40%.

b. The owner or operator shall report to the Director any malfunction resulting in excess particulate matter or excess opacity, not meeting the criteria set forth in 4.2.6.a., by telephone, telefax, or e-mail by the end of the next business day after becoming aware of such condition. The owner or operator shall file a certified written report concerning the malfunction with the Director within thirty (30) days providing the following information:

1. A detailed explanation of the factors involved or causes of the malfunction;

2. The date and time of duration (with starting and ending times) of the period of excess emissions;

3. An estimate of the mass of excess emissions discharged during the malfunction period;

4. The maximum opacity measured or observed during the malfunction;

5. Immediate remedial actions taken at the time of the malfunction to correct or mitigate the effects of the malfunction; and

6. A detailed explanation of the corrective measures or program that will be implemented to prevent a recurrence of the malfunction and a schedule for such implementation.

[45CSR§2-9.3, Emission Point IDs. (B1, B3)]

4.2.7. In the event of an unavoidable shortage of fuel having characteristics or specifications necessary for a fuel burning unit to comply with the visible emission standards set forth in 45CSR§2-3. or any emergency situation or condition creating a threat to public safety or welfare, the Director may grant an exception to the otherwise applicable visible emission standards for a period not to exceed fifteen (15) days, provided that visible emissions during the exception period do not exceed a maximum six (6) minute average of thirty (30) percent and that a reasonable demonstration is made by the owner or operator that the emission standards under 45CSR§2-4 will not be exceeded during the exemption period.

[45CSR§2-10.1, Emission Point IDs. (B1, B3)]

4.2.8. Due to unavoidable malfunction of equipment or inadvertent fuel shortages, emissions exceeding those provided for in 45CSR10 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the equipment malfunction or fuel shortage. In cases of major equipment failure or extended shortages of conforming fuels, additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.
[45CSR§10-9.1., Emission Point IDs. (B1, B3)]

4.3. Testing Requirements

4.3.1 At such reasonable times as the Director may designate, the owner or operator of any fuel burning unit(s) may be required to conduct or have conducted tests to determine the compliance of such unit(s) with the emission limitations specified in section 4.1.1., 4.1.8., 4.1.9., and 4.1.11. of this permit. Such tests shall be conducted in accordance with the appropriate methods specified below, or other equivalent EPA method approved by the Director, and in accordance with Requirement 4.3.4. Compliance testing shall be conducted at 100% of the peak load unless otherwise specified by the Director. The Director, or his duly authorized representative, may at his option witness or conduct such tests. Should the Director exercise his option to conduct such tests, the operator will provide all necessary sampling connections and sampling ports located in such manner as the Director 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.

a. Tests to determine compliance with PM emission limits shall be conducted in accordance with Method 5, 5A, 5B, 5C, 5D, 5E, 5F, 5G, or 5H as set forth in 40 CFR 60, Appendix A and EPA Method 201, 201A, and 202 as set forth in 40 CFR 51.

b. Tests to determine compliance with SO2 emission limits shall be conducted in accordance with Method 6, 6A, 6B, or 6C as set forth in 40 CFR 60, Appendix A.

c. Tests to determine compliance with CO emission limits shall be conducted in accordance with Method 10, 10A, or 10B as set forth in 40 C.F.R. 60, Appendix A.

d. Tests to determine compliance with NO_x emission limits shall be conducted in accordance with Method 7, 7A, 7B, 7C, 7D, or 7E as set forth in 40 C.F.R. 60, Appendix A.

e. Tests to determine compliance with VOC emission limits shall be conducted in accordance with Method 18, Method 25, or 25A as set forth in 40 CFR 60, Appendix A.

Sufficient information on temperatures, velocities, pressures, weights and dimensional values shall be reported to the Director, with such necessary commentary as he may require to allow an accurate evaluation of the reported test results and the conditions under which they were obtained.

The Director, or his duly authorized representative, may conduct such other tests as he may deem necessary to evaluate air pollution emissions other than those noted in subsection 45CSR§2-4.

[45CSR§2-8.1., 45CSR§30-5.1.c. and 45CSR13, Permit No. R13-2220 - (condition 4.3.1. and 4.3.2.), Emission Point IDs. (B1, B3)]

4.3.2. Reserved

4.3.3. Reserved

4.3.4. With regard to any testing required by the Director, the permittee shall submit to the Director of Air Quality a test protocol detailing the proposed test methods, the date, and the time the proposed testing is to take place, as well as identifying the sampling locations and other relevant information. The test protocol must be received by the Director no less than thirty (30) days prior to the date the testing is to take place. Test results shall be submitted to the Director no more than sixty (60) days after the date the testing takes place.

[45CSR§30-5.1.c., 45CSR13, Permit No. R13-2220 - (condition 4.5.1.), Equipment ID (B1, B3)]

4.4. Recordkeeping Requirements

4.4.1. A record of each visible emission check required by the monitoring requirements of section 4.2.1. above shall

be maintained on site. Said record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirements, the results of the check, what action(s), if any, was/were taken, and the name of the observer.

[45CSR§30-5.1.c., Emission Point IDs. (B1, B3)]

4.4.2 For the purposes of determining compliance with maximum throughput limits set forth by the **limitations and standards sections 4.1.3** and **4.1.4** American Woodmark Corporation shall maintain daily records which are to be summarized into monthly reports. Such records shall be retained by the permittee for at least five (5) years. Certified records shall be made available to the Director or his/her duly authorized representative upon request.
[45CSR13, Permit No. R13-2220 - (condition 4.4.4.), Equipment ID (B3)]

4.5. Reporting Requirements

4.5.1. The permittee shall obtain a certified report from the fuel supplier for each fuel shipment that shows the #2 Fuel Oil used to fire the B3 boiler does not contain greater than 0.3 weight percent sulfur. A semi-annual report that includes a copy of each certified report from the fuel supplier shall be submitted to the Director and to USEPA.

[40 C.F.R. 60, Subpart Dc, Sections 60.42c(h)(1) and 60.48c(d)- 60.48c(f)(1), 60.48c(j), Equipment ID(B3)]

4.6. Compliance Plan

4.6.1. N/A

5.0. Source-Specific Requirements [Wood Working Equipment; Emission Point ID(s) DC-1, DC-2, DC-4, DC-5, DC-6, BV1, and BV2]

5.1. Limitations and Standards

5.1.1. Particulate emissions from the woodworking baghouse vents shall not exceed the following limitations:

Baghouse Number	lb/hr	tons/yr
DC-1	0.93	3.3
DC-2	0.93	3.3
DC-4	0.47	1.7

The emission limits listed here are a result of incorporating particulate control equipment. Therefore these rates are well below the emission limits defined by 45CSR§7-4.1. Furthermore, compliance with Standard 5.1.1. streamlines compliance with 45CSR§7-4.1.

[45CSR14, Permit No. R14-0002(condition A.5.), 45CSR§7-4.1, Equipment IDs (DC-1, DC-2, DC-4)]

5.1.2. Particulate emissions from the woodworking baghouse designated as DC-5 shall not exceed 6.1 pounds per hour.

[45CSR§7-4.1, Equipment ID (DC-5)]

5.1.3. Baghouse, DC-5, shall be installed, maintained, and operated to achieve a minimum control efficiency of 99.8% in the control of particulate matter emissions from any and all woodworking equipment vented to the baghouse.

[45CSR§30-12.7, ID (DC-5)]

5.1.4. The permittee shall not cause, suffer, allow or permit emissions of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity, except as noted in subsection 3.2 of 45CSR7.

[45CSR§7-3.1, Equipment ID (DC-1, DC-2, DC-4, DC-5 and DC-6)]

5.1.5. The provisions of 5.1.4. above shall not apply to smoke and/or particulate matter emitted from any process source operation which is less than forty (40) percent opacity for any period or periods aggregating no more than five (5) minutes in any sixty (60) minute period.

[45CSR§7-3.2, Equipment ID (DC-1, DC-2, DC-4, DC-5 and DC-6)]

5.1.6. The permittee shall not cause, suffer, allow, or permit visible emissions from any storage structure(s) associated with any manufacturing process that pursuant to subsection 5.1. of 45CSR7 is required to have a full enclosure and be equipped with a particulate matter control device.

[45CSR§7-3.7, Equipment ID (S1 and S2)]

5.1.7. The permittee shall not cause, suffer, allow or permit any manufacturing process or storage structure generating fugitive particulate matter to operate that is not equipped with a system, which may include, but not be limited to, process equipment design, control equipment design or operation and maintenance procedures, to minimize the emissions of fugitive particulate matter. To minimize means such system shall be installed, maintained and operated to ensure the lowest fugitive particulate matter emissions reasonably achievable.

[45CSR§7-5.1, Equipment ID (S1 and S2)]

5.1.8. Wood waste fuel used to fire the B3 boiler shall be stored in enclosed storage silos designated as S1 and S2. These silos shall utilize particulate matter control devices, which vent to emission points BV1 and BV2.

[45CSR13, Permit No. R13-2220 - (condition 4.1.4.), Equipment ID (B3), and 45CSR§30-5.1.]

5.1.9. A fabric filter baghouse, BV2, shall be installed, maintained, and operated so as to achieve a design efficiency of 99.9% in the control of particulate matter emissions from any and all woodworking equipment vented to the baghouse.
[45CSR13, Permit No. R13-2220 - (condition 4.1.8.), Equipment ID (S2)]

5.1.10. The permitted facility shall be constructed and operated in accordance with information filed in Permit Applications R13-2220, R13-2220A, R13-2220B, R13-2220C, R13-2220D, R14-0002 and any amendments thereto. The Director may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to.

[45CSR14, Permit No. R14-0002 - (condition C.2.), 45CSR13, Permit No. R13-2220 (condition 2.5.1.)]

5.1.11. The fabric filter baghouse, identified in permit application R13-2220C as DC-6, shall be installed, maintained, and operated so as to achieve a design efficiency of 99.78% in the control of particulate matter emissions from any and all woodworking equipment vented to the baghouse.

[45CSR13, Permit No. R13-2220 - (condition 4.1.13), Equipment ID (DC-6)]

5.1.12. Particulate Matter (PM) emissions from the woodworking baghouse designated as DC-6 shall not exceed 2.27 pounds per hour and 7.08 tons per year.

This requirement streamlines compliance with the PM limit of 11.04 lb/hr PM defined by 45CSR§7-4.1.

[45CSR13, Permit No. R13-2220 - (condition 4.1.14) and 45CSR§7-4.1, Equipment ID (DC-6)]

5.2. Monitoring Requirements

5.2.1. The permittee shall conduct an annual preventative maintenance inspection/cleaning/replacement/refurbishment, as appropriate, of the bags, bag connections, and dust hoppers of the bag houses pertaining to emission points DC-1, DC-2,DC-4, DC-5, DC-6, BV1 and BV2, in order to ensure proper operation of the bag houses. Records shall be maintained on site stating the date and time of each bag house's annual preventative maintenance activity, the results of the annual preventative maintenance activity and, if appropriate, all corrective actions taken.

[45CSR§30-5.1.c., Emission Point IDs (DC-1, DC-2, DC-4, DC-5, DC-6, BV1, BV2)]

5.2.2. The permittee shall conduct monitoring once per shift to record the pressure drop across each of the bag houses pertaining to DC-1, DC-2, DC-4, DC-5, and DC-6. In order to ensure adequate control efficiencies are maintained, each bag house shall operate within the following daily average differential pressure ranges:

Baghouse ID	Differential Pressure - inches of water column (" W.C.)
DC-1	0.5 to 4.0
DC-2	0.5 to 4.0
DC-4	0.5 to 4.0
DC-5	0.5 to 4.0
DC-6	0.5 to 4.0

An excursion of the pressure drop indicator is defined as two consecutive daily average readings outside of the designated operating range. Excursions shall trigger an inspection, evaluation, and corrective action. Excursions are also required to be documented in the recordkeeping and reporting requirements of 5.4.2, 5.4.3, and 5.5.2.

[40 C.F.R. 64, Emission Point IDs (DC-1, DC-2, DC-4, DC-5, DC-6)]

5.2.3. **Proper Maintenance.** The permittee shall maintain monitoring at all times, including maintaining necessary spare parts for routine repairs of the monitoring equipment.

[45CSR§30-5.1.c.; 40 C.F.R. § 64.7(b)]

5.2.4. **Response to Excursions or Exceedances**

a. Upon detecting an excursion or exceedance, the permittee shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely

recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

b. Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

[40 C.F.R. § 64.7(d); 45CSR§30-5.1.c.]

5.2.5. **Documentation of Need for Improved Monitoring** – After approval of monitoring under 40 C.F.R. Part 64, if the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Director and, if necessary, submit a proposed modification to the permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 C.F.R. § 64.7(e); 45CSR§30-5.1.c.]

5.2.6. **Quality Improvement Plan (QIP)**

a. Based on the results of a determination, made under permit condition 5.2.4.b. or 5.2.6.b., the Administrator or the Director may require the permittee to develop and implement a QIP. If a QIP is required, then it shall be developed, implemented, and modified as required according to 40 C.F.R. §§ 64.8(b) through (e). Refer to permit condition 5.5.2.(b)(iii) for the reporting required when a QIP is implemented.

b. If five (5) percent or greater of the daily average baghouse differential pressure values, determined in accordance with 5.2.2. of this permit, indicate excursions of the established range during a calendar quarter, the permittee shall develop and implement a QIP. The Director may waive this QIP requirement upon a demonstration that the cause(s) of the excursions have been corrected, or may require stack tests at any time pursuant to permit condition 3.3.1.

[40 C.F.R. §§ 64.8 and 64.7(d); 45CSR§30-5.1.c.]

5.2.7. **Continued operation.** Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any

sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

[40 C.F.R. § 64.7(c); 45CSR§30-5.1.c.]

5.3. Testing Requirements

5.3.1. Visual emission checks of each emission point subject to an opacity limit shall be conducted monthly. These checks shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the emission point has visible emissions using 40 C.F.R. 60, Appendix A, Method 22. If visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 45CSR7A test within three (3) days unless the permittee can demonstrate a valid reason that the time frame should be extended. A 45CSR7A evaluation shall not be required if the visible emission condition is corrected within 24 hours and the emission source is operated at normal operating conditions.
[45CSR§30-5.1.c., Emission Point IDs (DC-1, DC-2, DC-4, DC-5, DC-6, BV1, BV2)]

5.4. Recordkeeping Requirements

5.4.1 A record of each visible emission check required by testing requirement 5.3.1. above shall be maintained on site. Said record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirements, the results of the check, what action(s), if any, was/were taken, and the name of the observer.

[45CSR§30-5.1.c., Emission Point IDs. (DC-1, DC-2, DC-3, DC-4, DC-5, DC-6, BV1, BV2)]

5.4.2. Records of the daily average baghouse pressure drop and corrective actions taken during excursions of the CAM plan indicator range shall be maintained on site and shall be made available to the Director or his duly authorized representative upon request.

[45CSR§30-5.1.c.; 40 C.F.R. §64.9(b)]

5.4.3. **General recordkeeping requirements for 40 C.F.R. Part 64 (CAM)**

The permittee shall comply with the recordkeeping requirements specified in permit conditions 3.4.1. and 3.4.2. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 C.F.R. §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 C.F.R. Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

[40 C.F.R. § 64.9(b); 45CSR§30-5.1.c.]

5.5. Reporting Requirements

5.5.1. Due to unavoidable malfunction of equipment, emissions exceeding those set forth in 45CSR7 may be permitted by the Director for periods not to exceed ten (10) days upon specific application to the Director. Such application shall be made within twenty-four (24) hours of the malfunction. In cases of major equipment failure additional time periods may be granted by the Director provided a corrective program has been submitted by the owner or operator and approved by the Director.

[45CSR§7-9.1., Equipment ID (DC-1, DC-2, DC-4, DC-5, DC-6, S1 and S2)]

5.5.2. **General reporting requirements for 40 C.F.R. Part 64 (CAM)**

a. On and after the date specified in 40 C.F.R. §64.7(a) by which the permittee must use monitoring that meets the requirements of 40 C.F.R. 64, the permittee shall submit monitoring reports to the DAQ in accordance with permit condition 3.5.6.

b. A report for monitoring under 40 C.F.R. 64 shall include, at a minimum, the information required under permit condition 3.5.8. and the following information, as applicable:

i. Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

ii. Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable) provided in accordance with 40 C.F.R. Part 75; and

iii. A description of the actions taken to implement a QIP during the reporting period as specified in 40 C.F.R. §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

[40 C.F.R. § 64.9(a); 45CSR§30-5.1.c.]

5.6. Compliance Plan - Not applicable

6.0. Source-Specific MACT Requirements for Finishing Operations - Spray Lines 1 and 2, Roll Coating line 4, Manual Spray Booths F1, F2, and F3; Emission Point ID's (F1, F2, and F3)

6.1. Limitations and Standards

6.1.1. The finishing operations, which includes as applied coatings and thinner usage encompassed by all wood furniture manufacturing operations shall limit VHAP emissions by achieving a weighted average VHAP content across all coatings and thinners no greater than (1 lb VHAP / lb Solids).

[45CSR34, 40 C.F.R. §63.802(a)(1), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.1.2. Spray booth cleaning methods shall limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 lb VOC/ lb Solid, as applied.

[45CSR34, 40 C.F.R. §63.802(a)(3),Equipment ID (Spray Booths F1, F2, and F3)]

6.1.3. Contact adhesives used in the wood furniture manufacturing operations shall limit VHAP emissions by achieving a VHAP limit not to exceed 1.0 lb VHAP / lb Solids, as applied.
[45CSR34, 40 C.F.R. §63.802(a)(2)(ii), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.1.4. American Woodmark Corporation shall maintain a work practice implementation plan in accordance with the monitoring and compliance procedures specified in 6.2.4 and thus 40 C.F.R. § 63.803.
[45CSR34, 40 C.F.R. §63.803 (a), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.2. Monitoring Requirements

6.2.1. American Woodmark Corporation (AWC) shall comply with the average VHAP content standard established in 6.1.1. [and thus, 40 C.F.R. §63.802 (a)(1)] by using the following method:

a. Calculate the average VHAP content for all finishing materials used at the facility using equation 1 and maintain a value of E no greater than 1.0;

Equation 1.

$$E = (Mc1\ Cc1 + Mc2\ Cc2 + * * * + Mcn\ Ccn + S1\ W1 + S2\ W2 + * * Sn\ Wn) / (Mc1 + Mc2 + * * * + Mcn)$$

[45CSR34, 40 C.F.R. §63.804(a)(1), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.2.2. AWC. shall comply with the standards established in 6.1.3. for contact adhesives by using compliant contact adhesives with a VHAP content no greater than 1 lb VHAP / lb Solid, as applied.
[45CSR34, 40 C.F.R. §63.804(c)(1), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.2.3. Continuous Compliance Demonstrations

a. AWC shall demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 1) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by 40 C.F.R. §63.807(c) (6.5.2 of this permit)

1. The compliance certification shall state that the value of (E), as calculated by Equation 1, is no greater than 1.0 for existing sources. An affected source is in violation of the standard if E is greater than 1.0 for any month. A violation of the monthly average is a separate violation of the standard for each day of peration, in which the 1.0 average is exceeded during the month, unless the affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.

2. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
[45CSR34, 40 C.F.R. §63.804 (g) (1), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

b. AWC operates an affected source subject to the provisions of 40 C.F.R. §63.802 (a)(2)(ii) established in emission standard 6.1.3. of this permit. The affected source complying with this standard through the procedures listed in 40 C.F.R. §63.804(c)(1), and thus defined by 6.2.2. of this permit shall submit a compliance certification with the semiannual report required by 40 C.F.R. §63.807(c). (6.5.2 of this permit).

1. The compliance certification shall state that compliant contact and /or foam adhesives have been used each day in the semiannual reporting period, or should other wise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.

2. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
[45CSR34, 40 C.F.R. §63.804 (g)(5), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

c. The permittee shall submit a compliance certification with the semiannual report required by 40C.F.R.§ 63.807(c), (6.5.2. of this permit).

1. The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semiannual reporting period, or should otherwise identify each day noncompliant materials were used. Each day a non compliant strippable booth coating is used is a single violation of the standard.

2. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
[45CSR34, 40 C.F.R. §63.804 (g)(7), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

d. AWC operates an affected source subject to the work practice standards defined in 40 C.F.R. §63.803 as specified by requirement 6.1.4 of this permit. Therefore AWC shall submit a compliance certification containing the following information with the semiannual report required by 40 C.F.R. §63.807(c), (6.5.2 of this permit):

1. The compliance certification shall state that the work practice implementation plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that an owner or operator is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation.

2. The compliance certification shall be signed by a responsible official of the company that owns or operates the affected source.
[45CSR34, 40 C.F.R. §63.804 (g)(8), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.2.4. American Woodmark Corporation (AWC) shall comply with the work practice standards required by the Wood Furniture MACT 40C.F.R.§63.803 and thus Standard Limitation 6.1.4 in accordance with the following guidelines:

a. AWC shall maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in 6.2.4.b. - 6.2.4.l. listed below. The written work practice implementation plan shall be available for inspection by the Administrator or Director upon request. If the Administrato or Director determines that the work practice implementation plan does not adequately address each of the topics specified by this section or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the Administrator or Director may require the affected source to modify the plan. Revisions or modifications to the plan do not require a revision of the sources Title V permit.
[40 C.F.R. §63.803(a), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

b. *Operator training course.* The permittee shall train all new personnel, those hired after November 21, 1997, upon hiring. All existing personnel, those hired before November 21, 1997, shall be trained within six months of the compliance date of the standard. All personnel shall be given refresher training annually. The affected source shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:

1. A list of all current personnel by name and job description that are required to be trained;
2. An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
3. Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and wash off procedures, appropriate equipment setup and adjustment to minimize finishing material usage and over spray, and appropriate management of cleanup wastes; and
4. A description of the methods to be used at the completion of initial or refresher training to demonstrate and document successful completion.
[40 C.F.R. §63.803(b), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

c. *Inspection and maintenance plan.* Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:

1. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
2. An inspection schedule;
3. Methods for documenting the date and results of each inspection and any repairs that were made;

4. The time frame between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:

   i. A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five calendar days after the leak is detected; and

   ii. Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three months.

[40 C.F.R. §63.803(c), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

d. *Cleaning and wash off solvent accounting system.* Each owner or operator of an affected source shall develop an organic HAP solvent accounting form to record:

1. The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined by 40 C.F.R. §63.801 as follows*: Organic HAP solven* means a HAP that is a volatile organic liquid used for dissolving or dispersing constituents in a coating or contact adhesive, adjusting the viscosity of a coating or contact adhesive, or cleaning equipment. When used in a coating or contact adhesive, the organic HAP solvent evaporates during drying and does not become a part of the dried film. ;

2. The number of pieces washed off, and the reason for the washoff; and

3. The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite.

[40 C.F.R. §63.803(d), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

e. *Chemical composition of cleaning and washoff solvents.* Each owner or operator of an affected source shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 to 40C.F.R.63 Subpart JJ, in concentrations subject to MSDS reporting as required by OSHA.
[40 C.F.R. §63.803(e), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

f. *Spray booth cleaning.* Each owner or operator of an affected source shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the affected source shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.
[40 C.F.R. §63.803(f), Equipment ID (Spray Booths F1, F2, and F3)]

g. *Storage requirements.* Each owner or operator of an affected source shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials.
[40 C.F.R. §63.803(g), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

h. *Application equipment requirements.* Each owner or operator of an affected source shall use conventional air spray guns to apply finishing materials only under any of the following circumstances:

1. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;

2. For touch up and repair under the following conditions:
   i. The touch up and repair occurs after completion of the finishing operation; or

   ii. The touch up and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touch up and repair are applied from a container that has a volume of no more than 2.0 gallons.

3. When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;

4. When emissions from the finishing application station are directed to a control device;

5. The conventional air gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or

6. The conventional air gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology.

The affected source shall demonstrate technical or economic infeasibility by submitting to the Administrator a videotape, a technical report, or other documentation that supports the affected source's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the affected source's claim of technical or economic infeasibility:

1. The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or

2. The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

[40 C.F.R. §63.803(h), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

i. *Line cleaning.* Each owner or operator of an affected source shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.
[40 C.F.R. §63.803(i), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

j. *Gun cleaning.* Each owner or operator of an affected source shall collect all organic HAP solvent used to clean spray guns into a normally closed container.
[40 C.F.R. §63.803(j), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

k. *Wash off operations.* Each owner or operator of an affected source shall control emissions from wash off operations by:

1. Using normally closed tanks for wash off; and

2. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

[40 C.F.R. §63.803(k), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

l. *Formulation assessment plan for finishing operations.* Each owner or operator of an affected source shall prepare and maintain with the work practice implementation plan a formulation assessment plan that:

1. Identifies VHAP from the list presented in Table 5 of 40C.F.R.63 Subpart JJ, that are being used in finishing operations by the affected source;

2. Establishes a baseline level of usage by the affected source, for each VHAP identified in paragraph (l)(1) of this section. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in paragraph (l)(1) of this section. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16. Sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the equation in 40 C.F.R. §63.805(d) or (e).

3. Tracks the annual usage of each VHAP identified in (l)(1) by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.

4. If, after November 1998, the annual usage of the VHAP identified in paragraph (l)(1) exceeds its baseline level, then the owner or operator of the affected source shall provide a written notification to the permitting authority that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any State regulations or requirements for that VHAP:

i. The exceedance is no more than 15.0 percent above the baseline level;

ii. Usage of the VHAP is below the de minimis level presented in Table 5 of 40C.F.R.63 Subpart JJ for that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in 40 C.F.R. §63.805(d) or (e));

iii. The affected source is in compliance with its State's air toxic regulations or guidelines for the VHAP; or

iv. The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied.

5. If none of the above explanations are the reason for the increase, the owner or operator shall confer with the permitting authority to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by the permitting authority and owner or operator. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the owner or operator shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.

6. If, after November 1998, an affected source uses a VHAP of potential concern listed in Table 6 of 40C.F.R.63 Subpart JJ for which a baseline level has not been previously established, then the baseline level shall be established as the *de minimis* level provided in that same table for that chemical. The affected source shall track the annual usage of each VHAP of potential concern identified in this paragraph that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the *de minimis* level listed in table 6 of 40C.F.R.63 Subpart JJ for that chemical, then the affected source shall provide an explanation to the permitting authority that documents the reason for the exceedance of the *de minimis* level. If the explanation is not one of those listed in paragraphs (l)(4)(i) through (l)(4)(iv) of this section, the affected source shall follow the procedures in paragraph (l)(5) of this section.

[40 C.F.R. §63.803(l)(1-6), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.3. Testing Requirements

6.3.1. N/A

6.4. Recordkeeping Requirements

6.4.1. General Recordkeeping Requirements;

a. The owner or operator of an affected source subject to 40C.F.R.63 Subpart JJ shall fulfill all recordkeeping requirements of 40 C.F.R. §63.10 of Subpart A, according to the applicability criteria in 40 C.F.R. §63.800(d) of Subpart JJ.
[40 C.F.R. §63.806(a), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

1. The owner or operator of an affected source subject to the provisions of part 63 shall maintain files of all information (including all reports and notifications) required by part 63, recorded in a form

suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.
[40 C.F.R. §63.10 (b)(1), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.4.2. Specific Recordkeeping Requirements;

a. AWC shall maintain records of the following:

1. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limitations in 40 C.F.R. §63.802 and thus section 6.1. of this permit; and

2. The VHAP content in kg VHAP/ kg solids (lb VHAP/ lb solids), as applied, of each finishing material and contact adhesive subject to the emission limit in 40 C.F.R. §63.802 and thus section 6.1. of this permit; and

3. The VOC content, in kg VOC/ kg solids (lb VOC/ lb solids), as applied, of each strippable booth coating subject to the emission limits in 40 C.F.R. §63.802(a)(3), (6.1.2 of this permit).
[40 C.F.R. §63.806 (b)(1,2,&3, Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

b. AWC, while following the compliance method in 40 C.F.R. §63.804(a)(1) or (d)(1), (6.2.1. of this permit), shall maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1.
[40 C.F.R. §63.806(c), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

c. With respect to the work practice standards of 40 C.F.R.§63.803, (6.2.4. of this permit), AWC shall maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including, but no limited to:

1. Records demonstrating that the operator training program required by 40 C.F.R. §63.803(b), (6.2.4.b of this permit), is in place;
2. Records collected in accordance with the inspection and maintenance plan required by 40 C.F.R. §63.803(c), (6.2.4.c. of this permit);
3. Records associated with the cleaning solvent accounting system required by 40 C.F.R. §63.803(d), (6.2.4.d. of this permit);
4. Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semiannual period as required by 40 C.F.R. §63.803(h)(5), (6.2.4.h.5. of this permit).
5. Records associated with the formulation assessment plan required by 40 C.F.R. §63.803(l), (6.2.4.l. of this permit); and
6. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
[40 C.F.R. §63.806 (e)(1)-(6), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

d. AWC as a result of being subject to the emission limit in 40 C.F.R. §63.802 and following the compliance provisions of 40 C.F.R. §63.804 (f) (1), (2), (3), (5), (7) and (8) as well as 40 C.F.R. §63.804 (g) (1), (2), (3), (5), (7) and (8) shall maintain records of the compliance certifications submitted in accordance with 40 C.F.R. §63.807(c), (6.5.2. of this permit), for each semiannual period following the compliance data.
[40 C.F.R. §63.806 (h), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

e. AWC shall maintain records of all other information submitted with the compliance status report required by 40 C.F.R. §63.9 (h) and 40 C.F.R. §63.807 (b), and the semiannual reports required by 40 C.F.R. §63.807(c), (6.5.2. of this permit).
[40 C.F.R. §63.806 (I), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

f. AWC shall maintain all records in accordance with the requirements of 40 C.F.R. §63.10(b)(1) as specifically identified in requirement 6.4.1.a.1. of this permit.
[40 C.F.R. §63.806 (j), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.5. Reporting Requirements

6.5.1. AWC shall fulfill all reporting requirements of 40 C.F.R.§63.7 through 40 C.F.R. §63.10 of subpart A (General Provisions) according to the applicability criteria in 40 C.F.R. §63.800(d) of Subpart JJ.
[40 C.F.R. §63.807 (a), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.5.2. With respect to demonstrating compliance in accordance with 40 C.F.R. §63.804 (g)(1), (5), (7), and (8), (6.2.3. of this permit), AWC shall submit a report covering the previous 6 months of wood furniture manufacturing operations:

a. The first report shall be submitted 30 calendar days after the end of the first 6-month period following the compliance date.

b. Subsequent reports shall be submitted 30 calendar days after the end of each 6-month period following the first report.

c. The semiannual reports shall include the information required by 40 C.F.R. §63.804 (g)(1), (5), (7), and (8), (6.2.3. of this permit), a statement of whether the affected source was in compliance or noncompliance, and, if the affected source was in noncompliance, the measures taken to bring the affected source into compliance.

d. The frequency of the reports required by 6.5.2. of this permit and thus 40 C.F.R. §63.807(c) of the MACT requirement shall not be reduced from semiannually regardless of the history of the owner's or operator's compliance status.

[40 C.F.R. §63.807(c), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.5.3. The owner or operator of an affected source required to provide a written notification under 40 C.F.R. §63.803 (l)(4), (6.2.4.(l)(4) of this permit), shall include in the notification one or more statements that explains the reasons for the usage increase. The notification shall be submitted no later than 30 calendar days after the end of the annual period in which the usage increase occurred.
[40 C.F.R. §63.807(e), Equipment ID (Line-1, Line-2, Line-4 and Spray Booths F1, F2, and F3)]

6.6. Compliance Plan

6.6.1. N/A.

7.0. Source-Specific Requirements for Finishing Operations - Spray Lines 1 and 2, Roll Coating Line 4, Manual Spray Booths F1, F2, and F3; Emission Points ID's (F1, F2, and F3)

7.1. Limitations and Standards

7.1.1. Particulate matter (PM) and volatile organic compound (VOC) emissions from finishing Line-1, Line-2, and spray booths F1 and F2 shall not exceed 3.56 **lb/hr** PM and 700 **lb/hr** VOC. Since the 45CSR§7-4.1 PM limit of each individual line or spray booth is greater than the aggregate limit specified herein, compliance with this requirement also satisfies compliance with 45CSR§7-4.1
[45CSR§7-4.1, 45CSR14, Permit No. R14-0002, condition (A.1.), Equipment ID (Line-1, Line-2, and Spray Booths F1 and F2)]

7.1.2 Total particulate matter (PM) and volatile organic compound (VOC) emissions from finishing Line-1, Line-2, and spray booths F1 and F2 shall not exceed 12.8 **tons/yr** PM and 2,520 **tons/yr** VOC.
[45CSR14, Permit No. R14-0002, condition (A.2.), Equipment ID (Line-1, Line-2, and Spray Booths F1 and F2)]

7.1.3. Total emissions of volatile organic compounds (VOC) from the UV coating finishing line, designated as Line-4, shall not exceed 10.8 pounds per hour nor 38.9 tons per year.
[45CSR13, Permit No. R13-1829, condition (A.1.), Equipment ID (Line-4)]

7.1.4. Total emissions of aggregate hazardous air pollutants (HAPs) for the UV coating/finishing line, designated as Line-4, shall not exceed 1.5 pounds per hour nor 2 tons per year.
[45CSR13, Permit No. R13-1829, condition (A.2.), Equipment ID (Line-4)]

7.1.5. Particulate matter (PM) emissions from Spray Booth F3 shall not exceed 0.76 lb/hr. Compliance with this limit shall streamline compliance with the 1.00 lb/hr TSP limit defined by 7.1.6 below .
[45CSR§7-4.1, Equipment ID (Spray Booth F3)]

7.1.6. The manual spray booth, F3, shall be monitored and operated according to the following conditions:

a. The emission rates of the listed pollutants from surface coating and associated clean-up operations shall not exceed the following:

Pollutant	pounds/hour(1)	tons/year(2)
Total Suspended Particulate (TSP)	1.00	0.50
Volatile Organic Compounds (VOCs)	4.61	9.58
Hazardous Air Pollutants (HAPs)(3)	1.24	2.57
Formaldehyde	no limit	0.05

(1) All pound/hour limits are as averaged over one calendar month of operations.
(2) The annual limits represent a twelve (12) month rolling total limit. A twelve month rolling total shall mean the sum of the emissions for the previous twelve (12) months.
(3) HAPs are those chemical compounds listed under Section 112(b) of the Clean Air Act Amendments of 1990 and any amendments or revisions thereto.

b. All spray guns shall be operated and maintained so as to achieve a minimum 50.0% transfer efficiency in the application of surface coating onto any substrate.

c. The spray booths shall be designed, operated, and maintained with adequate negative pressure so as to capture 100.0% of over spray from the application of the surface coatings.

d. Mat filters shall be installed, maintained, and operated so as to achieve a minimum efficiency of 90.0% in the control of particulate matter emissions.

e. At least monthly, visual inspections of the spray guns, paint booths, and mat filters shall be made so as to ensure the achievement of the minimum transfer/capture/control efficiencies required above. The visual inspection shall be conducted so as to find any defect or deterioration in quality of the spray guns, paint booths, and mat filters that would cause or contribute to a reduction of the transfer/capture/control efficiency to below the minimums required in this section. Upon detection of a defect or a deterioration in quality of any of the equipment, repair or replacement of the affected equipment shall take place prior to any further surface coating operations that utilize said affected equipment. A record of each visual inspection required above shall be maintained on site for a period of no less than five (5) years. Said record shall include, but not be limited to, the date, time, listing of equipment checked, the results of the check, what action(s), if any, was/were taken, and the name of the observer.

f. The following HAPs were identified as surface coating/thinner constituents in permit application R13-2220A:

HAP	CAS Number
Formaldehyde	50-00-0
Xylene	1330-20-7
Ethyl benzene	100-41-4
Methanol	67-56-1
Cumene	98-82-8
Methyl Isobutyl Ketone	108-10-1
Toluene	108-88-3
Glycol Ethers	Group
Manganese (PM-HAP)	n/a
Chromium (PM-HAP)	n/a

Use of any surface coating/thinner 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:

1. The permittee shall notify the Director in writing of the surface coating/thinner to be used and the HAP(s) contained therein within thirty (30) days of the use of the surface coating. Additionally, a MSDS sheet for the surface coating shall be supplied at this time to the Director.

2. The use of the surface coating/thinner shall be incorporated into the record keeping requirements contained herein and contribute to the individual and aggregate HAP emission rate as limited herein by 7.1.6.a. and recorded in accordance with 7.2.5 of this permit.

3. The use of any surface coating/thinner containing any toxic air pollutant (TAP), as defined by West

Virginia Legislative Rule 45CSR27, Section 2.10, that results in an increase in TAP emissions over the threshold described in 45CSR13, Section 2.17(c), is prohibited prior to receiving a modification to this permit for the use of the specified surface coatings.

g. Operation of the manual spray booth shall be in accordance with all applicable requirements contained in 40 C.F.R. 63, Subpart JJ and thus, Section 6 of this Title V Permit.

[45CSR13, Permit No. R13-2220, Condition (4.1.11.), Equipment ID (F3)]

7.1.7. No person shall cause, suffer, allow or permit emission of smoke and/or particulate matter into the open air from any process source operation which is greater than twenty (20) percent opacity.

[45CSR§7-3.1, Equipment IDs (Line-1, Line-2 and Spray Booths F1, F2, and F3)]

7.2. Monitoring, Testing, Recordkeeping and Reporting Requirements

7.2.1. Compliance with provisions 7.1.1 and 7.1.2 of this permit shall be demonstrated by maintaining daily recordkeeping on finishing Line-1 and Line-2 as well as Spray Booths F1 and F2. The following information must be recorded daily for Line-1, Line-2 and Spray Booths F1 and F2:

* Hours of actual finishing operation.
* Identity and total quantity, in gallons, of each stain, sealer, topcoat and solvent used on the finishing lines and spray booths.

The hourly particulate matter and VOC emission rates for each finishing line or spray booth shall be determined as follows, where the VOC and particulate losses from all stains, sealers, topcoats, and solvents are summed:

lb/hr VOC = (Qi * Vi)/t

lb/hr PM = ((1-CE) * (1-TE) * Qi * Si) / t

Where,

Qi = Gallons of coating (i) or solvent (i) used on the line or spray booth during the operating day
Vi = VOC content of coating (i) or solvent (i), in lbm/gallon of coating or solvent
t = Hours of operation for the coating line or spray booth during the specific day.
CE = Particulate fractional control efficiency for the spray cabinets or booths.
TE = Solids fractional transfer efficiency for the finish line or spray booth
Si = Solids content of coating (i) or solvent (i), in lbm/gallon of coating or solvent.

A calender quarterly report shall be submitted to the WVDAQ which contains a summary of all the daily emission determinations, summary total of VOC and particulate matter emissions from the finishing operations during the quarter, (tons for period), and the total quantity (in gallons) of each stain, sealer, and topcoat received at the plant during the quarter. This report must be submitted to the WVDAQ no later than the 15 th day following the last day of each calendar quarter.

[45CSR14, Permit No. R14-0002, condition (B.4.) - Equipment ID (Line-1, Line-2, F1, F2)]

7.2.2 Compliance with provision 7.1.3 and 7.1.4. of this permit shall be demonstrated by daily and monthly record keeping with respect to the operation of the UV finishing line designated as Line-4.

a. The following information shall be recorded daily:

1. Hours of actual finishing operations conducted.

2. Identify, total quantity (gallons), VOC content (pounds per gallon), as well as individual and aggregate HAP content (pounds per gallon) of each stain, sealer, topcoat, solvent or other coating materials applied on the finishing line.

3. Calculated VOC as well as individual and aggregate HAP emissions in pounds per hour based on an average defined by the total number of hours the subject line operated **per day.**

b. The daily operating logs shall be summarized into monthly reports, which shall include the following information:

1. Total hours of actual finishing operations conducted during the month.

2. The type and total quantity of each coating and/or solvent applied during the month.

3. The highest daily value in pounds per hour tabulated during the month for the following constituents: VOC, total HAPs and individual HAP values. The highest values (lb/hr) observed during the month shall be reported with the date in which each value corresponds. If the hourly VOC limit established by 7.1.3. or 7.1.4. of this permit is exceeded then list all date(s) of such occurrence and the associated daily average, lb/hr VOC, calculated.

4. The permittee shall also calculate and maintain a rolling 12 month total for all regulated pollutant(s).

All operating logs and monthly reports shall be maintained on-site for no less than 5 years. These records shall be certified by a responsible official and made available to the Director or his/her authorized representative upon request .

[45CSR13, Permit No. R13-1829, condition (B.1), Equipment ID (Line-4)]

7.2.3. The following HAPs were identified in permit application R13-1829A as potential material constituents of the surface coatings/thinners utilized by the #4 finishing line:

HAP	CAS Number
Acrylic Acid	79-10-7
Benzyl Chloride	100-44-7
Cumene	98-82-8
Dibutyl Phthlate	84-74-2
Ethylene Glycol	107-21-1
Ethylbenzene	100-41-4
Formaldehyde	50-00-0
Hexamethylene-1,6-diisocyanate	822-06-0
Hydroquinone	123-31-9
Methanol	67-56-1
Methyl Ethyl Ketone	78-93-3
Methyl Isobutyl Ketone	108-10-1
Methyl Methacrylate	80-62-6
Naphthalene	91-20-3

HAP	CAS Number
Toluene	108-88-3
Xylene	1330-20-7
Glycol Ethers	Group
Chromium Compounds (PM-HAP)	N/A
Manganese Compounds (PM-HAP)	N/A

Use of any surface coating/thinner 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 Director in writing of the surface coating/thinner to be used and the HAP(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 Director.

b. The use of the surface coating/thinner shall be incorporated into the record keeping requirements of 7.2.2. and contribute to the aggregate HAP emission rate as limited by 7.1.4.

c. The use of any surface coating/thinner containing any air pollutant listed in Table 45-13A of 45CSR13, that results in an increase in TAP emissions over the threshold described in 45CSR13, Section 2.17.c. or 2.17.d., is prohibited prior to receiving a modification to this permit for the use of the specified surface coatings.

[45CSR13, Permit No. R13-1829, condition (B.2.), Equipment ID (Line-4)]

7.2.4. The number four UV coating/finishing line shall comply with the applicable requirements of 40C.F.R.63 Subpart JJ “Wood Furniture Manufacturing Operations” and thus Section 6.0 of this Title V Pemit.
[45CSR13, Permit No. R13-1829, condition (B.3.), Equipment ID (Line-4)]

7.2.5. The manual spray booth designated as F3 shall demonstrate compliance with Standard Limitation **7.1.6.** by performing the following:

a. The permittee shall maintain records of the following:

1. The name and volume (in gallons) of each surface coating, as applied, on a monthly basis; and

2. The mass of VOCs, individual and aggregate HAPs, and solids per volume of each surface coating, as applied, on a monthly basis.

Additionally, within fifteen (15) days of the last day of each month, the permittee shall prepare a summary report that contains the following information: hourly, monthly, and rolling 12-month annual emission rates for VOCs, individual and aggregate HAPs, and PM from the application of surface coatings, and hours of operation of the application of surface coatings at the facility. Said records shall be maintained on-site for a period of five (5) years. Certified records shall be made available to the Director of the Division of Air Quality or his/her duly authorized representative upon request.

b. The following formulas shall be used to determine the quantities specified in section **7.2.5.(a)** above.

1. The mass of VOCs, aggregate and individual HAPs, and solids *per volume* (in pounds per gallon) of each surface coating shall be determined by one of the following methods:

   i. Certified product data sheets provided by the coating supplier, or

   ii. 40 C.F.R. 60, Appendix A, Method 24.

2. The mass of VOCs, aggregate and individual HAPs, and solids of each surface coating, as applied, on a monthly basis, shall be calculated using the following formula:

   $Mass_{(\text{pounds of VOCs, HAPs, or Solids/Month})} = A*B$

   Where: A = monthly material usages in gallons per month
   B = VOCs, aggregate and individual HAPs, or Solids content of the materials used in pounds per gallon as determined below.

3. The annual, monthly, and hourly emission rates of VOCs, aggregate and individual HAPs, shall be calculated in the following manner:

   i. The annual emission rate of VOCs, aggregate and individual HAPs, shall be calculated as the sum of the monthly emission rates of VOCs, aggregate and individual HAPs, respectively, from the previous twelve (12) months.

   ii. The monthly emission rate of VOCs, aggregate and individual HAPs, shall be calculated as the mass of VOCs, aggregate and individual HAPs, (as calculated above in 7.2.5.(b)(2), as applied, for the specified month.

   iii. The hourly emission rates of VOCs, aggregate and individual HAPs, shall be calculated, on a monthly basis, using the following formula:

   $Emission\ rate_{(\text{pounds of VOCs, HAPs/Hour})} = C/D$

   Where: $C = Mass_{(\text{pounds of VOCs, HAPs//Month})}$
   D = Monthly hours of surface coating operations

4. The annual, monthly, and hourly emission rates of PM shall be calculated in the following manner:

   i. The annual emission rate of PM shall be calculated as the sum of the monthly emission rate of PM from the previous twelve (12) months.

   ii. The monthly emission rate of PM shall be calculated using the following formula:

   $Emission\ rate_{(\text{PM/month})} = [C*(1-(TE/100))]*[1-((CapEff/100)*(ConEff/100))]$

   Where: $C = Mass_{(\text{pounds of Solids/Month})}$
   TE = Estimated Minimum Transfer Efficiency of Surface Coating Operations (specified to be 50% under **7.1.6.(b)**)
   CapEff = Estimated Minimum Capture Efficiency of Spray Booths (specified to be 100% under **7.1.6.(c)**)
   onEff = Estimated Minimum Control Efficiency of Mat Filters (specified to be a minimum of 90% under **7.1.6.(d)**)

iii. The hourly emission rates of PM shall be calculated, on a monthly basis, using the following formula:

Emission rate$_{\text{(pounds of PM/Hour)}}$ = C/D

Where: C = Mass$_{\text{(pounds of Solids/Month)}}$
D = Monthly hours of surface coating operations

[45CSR13, Permit No. R13-2220, condition (4.4.5.), Equipment ID (F3)]

7.2.6. Visual emission checks of each emission point subject to an opacity limit shall be conducted monthly. These checks shall be conducted during periods of normal facility operation for a sufficient time interval to determine if the emission point has visible emissions using procedures outlined in 40 C.F.R. 60, Appendix A, Method 22. If sources of visible emissions are identified during the survey, or at any other time, the permittee shall conduct a 45CSR7A evaluation within three (3) days unless the permittee can demonstrate a valid reason that the time frame should be extended. A 45CSR7A evaluation shall not be required if the visible emission condition is corrected within 24 hours and the emission source is operated at normal operating conditions.
[45CSR§30-5.1.c., Emission Point IDs (Line-1, Line-2 and Spray Booths F1, F2, and F3)]

7.2.7. A record of each visible emission check required by the testing requirement 7.2.6. above shall be maintained on site. Said record shall include, but not be limited to, the date, time, name of emission unit, the applicable visible emissions requirements, the results of the check, what action(s), if any, was/were taken, and the name of the observer.
[45CSR§30-5.1.c., Emission Point IDs. (Line-1, Line-2 and Spray Booths F1, F2, and F3)]

7.3. Compliance Plan

7.3.1 N/A