



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

9/26/2013

Tina McCarthy  
AMES TRUE TEMPER INC  
465 RAILROAD AVE  
PO BOX 8859  
CAMP HILL, PA 17001-8859

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0661000025  
Permit Number: P0114906  
Permit Type: Initial Installation  
County: Noble

Certified Mail

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

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

**How to appeal this permit**

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-SEDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
AMES TRUE TEMPER INC**

Facility ID:	0661000025
Permit Number:	P0114906
Permit Type:	Initial Installation
Issued:	9/26/2013
Effective:	9/26/2013
Expiration:	9/26/2023





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
AMES TRUE TEMPER INC

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**Final Permit-to-Install and Operate**  
AMES TRUE TEMPER INC  
**Permit Number:** P0114906  
**Facility ID:** 0661000025  
**Effective Date:** 9/26/2013

## Authorization

Facility ID: 0661000025  
Application Number(s): A0047994, A0048027  
Permit Number: P0114906  
Permit Description: Initial PTIO for existing sawmill, woodworking, and coating operations including: debarking, sawing, shaping, kiln drying and coating.  
Permit Type: Initial Installation  
Permit Fee: \$5,400.00  
Issue Date: 9/26/2013  
Effective Date: 9/26/2013  
Expiration Date: 9/26/2023  
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

AMES TRUE TEMPER INC  
21460 Ames Lane  
Dexter City, OH 45727

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

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

Ohio EPA DAPC, Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740)385-8501

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



**Final Permit-to-Install and Operate**  
AMES TRUE TEMPER INC  
**Permit Number:** P0114906  
**Facility ID:** 0661000025  
**Effective Date:** 9/26/2013

## Authorization (continued)

Permit Number: P0114906  
Permit Description: Initial PTIO for existing sawmill, woodworking, and coating operations including: debarking, sawing, shaping, kiln drying and coating.

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

<b>Emissions Unit ID:</b>	<b>F001</b>
Company Equipment ID:	F001
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F002</b>
Company Equipment ID:	F002
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>F003</b>
Company Equipment ID:	Chipper
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>K001</b>
Company Equipment ID:	Handle Coating Operations
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
AMES TRUE TEMPER INC  
**Permit Number:** P0114906  
**Facility ID:** 0661000025  
**Effective Date:** 9/26/2013

## **A. Standard Terms and Conditions**



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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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



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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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<sup>1</sup> Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



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

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

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

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

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

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



**Final Permit-to-Install and Operate**  
AMES TRUE TEMPER INC  
**Permit Number:** P0114906  
**Facility ID:** 0661000025  
**Effective Date:** 9/26/2013

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install and Operate**

AMES TRUE TEMPER INC

**Permit Number:** P0114906

**Facility ID:** 0661000025

**Effective Date:** 9/26/2013

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.



**Final Permit-to-Install and Operate**  
AMES TRUE TEMPER INC  
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## **C. Emissions Unit Terms and Conditions**



**1. F001, Sawmill operations**

**Operations, Property and/or Equipment Description:**

Sawmill operations (cutoff saw, head saw, rip saw, and two equalizers) enclosed in a building and controlled with an exterior cyclone with 85% capture efficiency and 85% control efficiency, a fabric filter baghouse with a capture efficiency of 100% and 99% control efficiency and a building control of 70%. Log debarker controlled by wet suppression. Silo (A) load-out operation into trucks.

c) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

d) **Applicable Emissions Limitations and/or Control Requirements**

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) from the baghousestack serving this emissions unit shall not exceed 0.58 lb/hr and 2.54 TPY.</p> <p>Total fugitive PE from sawmill operations including the cutting, debarking, and silo load-out operations shall not exceed 90.97TPY.</p> <p>There shall be no visible PE from the baghouse stack and no visible PE of fugitive dust from building egress points (i.e., building windows, doors, etc.) serving this emissions unit.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Visible PE of fugitive dust from wood waste Silo (A) load-out shall not exceed ten percent opacity as a three-minute average.</p> <p>Visible PE of fugitive dust from the debarker shall not exceed zero percent opacity as a three-minute average.</p> <p>Best available control measures that are sufficient to eliminate visible emissions of fugitive dust.</p> <p>See b.(2)a.-d. below.</p>
b.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The sawmill and material handling operations that are covered by this permit and subject to the following requirements are listed below:

Wood waste storage silo (A), hydraulically loaded from the baghouse  
 Silo (A) load-out into trucks via gravity  
 Debarker  
 Cutoff saw  
 Head saw  
 Rip saw  
 2 Equalizers

- b. The permittee shall employ best available control measures for the above-identified woodworking operations and wood waste storage bin load-out for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee will maintain 85% cyclone capture efficiency and 70% building capture efficiency of fugitive dust from the wood waste generated by the cutoff saw, head saw, rip saw and equalizers. The wood waste shall be vented to the cyclone and then to EF150 baghouse with 99% control efficiency. Wood waste from the baghouse shall be hydraulically transported to Silo A then emptied by gravity into mobile



trailers as needed. Wood waste from the debarker shall be kept sufficiently wet to eliminate visible emissions. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- c. For each woodworking operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the daily VE checks conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measure(s) is unnecessary.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- e. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Noble County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- f. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

e) Operational Restrictions

- (1) None.

f) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the



following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 4.0 to 6.0 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (2) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible emissions from the baghouse stack and from building egress points (i.e., building windows, doors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (3) For each portion of the wood waste storage Silo (A) load-out that is not adequately enclosed, the permittee shall perform daily inspections of the wood waste storage Silo (A) load-out operations in accordance with the following minimum frequencies in order to determine if control measures need to be implemented:

<u>Material handling operation</u>	<u>Minimum Inspection Frequency</u>
Wood waste storage silo load-out	During each load-out event

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. The inspections shall be performed during representative, normal operating conditions.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;



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

g) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

h) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

PE from the baghousestack serving this emissions unit shall not exceed 0.58 lb/hr and 2.54 TPY.

Applicable Compliance Methods:

The lb/hr emissions limitation was based on the emissions data of 456.62 lb PE/hr uncontrolled with a cyclone capture efficiency of 85% and 85% control and a baghouse efficiency of 100% capture and 99% control, as submitted in the application.

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance the annual emissions limitation was established by the following one-time calculation:

$$456.62 \text{ lb PE/hr} - (456.62 \text{ lb PE/hr})(1-0.85) = 58.22 \text{ lb PE/hr}$$

$$(58.22 \text{ lb PE/hr})(1-0.99) = 0.58 \text{ lb PE/hr}$$

$$(0.58 \text{ lb PE/hr})(8,760 \text{ hr/yr})(0.0005 \text{ ton/lb}) = 2.54 \text{ TPY}$$

b. Emissions Limitation:



Total fugitive PE from sawmill operations including the cutting, debarking, and silo load-out operations shall not exceed 90.97 TPY.

Applicable Compliance Method:

The annual emissions limitation was established by the following one-time calculation:

Stack PE<sub>FUG</sub>

$$(456.62 \text{ lb PE/hr})(1-0.85) = 68.49 \text{ lb PE/hr}$$

$$(68.49 \text{ lb PE/hr}) - [(68.49)(0.70)] = 20.55 \text{ lb PE/hr}$$

$$(20.55 \text{ lb PE/hr})(8,760 \text{ hr/yr})(0.0005 \text{ ton/lb}) = 90.01 \text{ TPY}$$

Silo (A) PE<sub>FUG</sub>

$$(3,792.13 \text{ TPY})(2.0 \text{ lb PE/ton}) = 7,584.3 \text{ lb PE/yr}$$

$$7,584.3 \text{ lb PE/yr} / 8,760 \text{ hr} = 0.87 \text{ lb PE/hr}$$

$$(0.87 \text{ lb/hr})(1-0.75) = 0.22 \text{ lb PE/hr}$$

$$(0.22 \text{ lb PE/hr})(8760 \text{ hr/yr})(0.0005 \text{ ton/lb}) = 0.96 \text{ TPY}$$

Debarker PE<sub>FUG</sub>

$$(3,421.88 \text{ TPY})(0.024 \text{ lb PE/ton}) = 82.13 \text{ lb PE/yr}$$

$$82.13 \text{ lb PE/yr} / 8,760 \text{ hr} = 0.0094 \text{ lb PE/hr}$$

$$(0.0094 \text{ lb/hr})(1-0.95) = 0.00047 \text{ lb PE/hr}$$

$$(0.00047 \text{ lb PE/hr})(8,760 \text{ hr/yr})(0.0005 \text{ ton/lb}) = 0.0021 \text{ TPY}$$

Total PE<sub>FUG</sub>

$$90.1 \text{ TPY} + 0.96 \text{ TPY} + 0.0021 \text{ TPY} = 90.97 \text{ TPY}$$

Where:

456.62 lb PE/hr = uncontrolled emissions from sawmill operations, as submitted in the application; and

70% = control efficiency of building.

3,792.13 TPY = maximum potential of wood waste unloaded from Silo A, as submitted in the application;

2.0 lb PE/ton = uncontrolled emission factor for wood waste load-out, RACM, table 2.17-1 (9/1980); and



75% = control efficiency for load-out using a telescopic tube (minimized drop height), RACM, table 2.17-3 (9/1980).

3,421.88 TPY = maximum potential of wood waste generated from debarker, as submitted in the application;

0.024 lb PE/ton = uncontrolled emission factor for log debarking, RACM, table 2.17-1(9/1980); and

95% = control efficiency from wet storage of logs prior to debarking, RACM, table.

c. Emissions Limitation:

There shall be no visible PE from the baghouse stack and no visible PE of fugitive dust from building egress points (i.e., building windows, doors, etc.) serving this emissions unit.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 22.

d. Emissions Limitation:

Visible PE of fugitive dust from wood waste storage Silo (A) load-out shall not exceed ten percent opacity as a three-minute average.

Applicable Compliance Method:

If required, visible PE shall be determined according to USEPA Method 9.

e. Emissions Limitation:

Visible PE of fugitive dust from the debarker shall not exceed zero percent opacity as a three-minute average.

Applicable Compliance Method:

If required, visible PE shall be determined according to USEPA Method 9.

i) Miscellaneous Requirements

(1) None.



**2. F002, Woodworking operations**

**Operations, Property and/or Equipment Description:**

Woodworking operations (double-end trim saw, moulder, five chuckers, and sander) enclosed in a building and controlled with an exterior cyclone with 85% capture efficiency and 85% control efficiency, a fabric filter baghouse with a capture efficiency of 100% and 99% control efficiency and a building control of 70%. Silo (B) load-out operation into trucks.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) from the baghousestack serving emissions units F002 and F003 shall not exceed 0.52 lb/hr and 2.28 TPY.</p> <p>Total fugitive PE from the woodworking operations (including trimming, cutting, sanding), wood chipping (F003), and Silo (B) load-out operations shall not exceed 81.95TPY.</p> <p>There shall be no visible PE from the baghouse stack and no visible PE of fugitive dust from building egress points (i.e., building windows, doors, etc.) serving this emissions unit.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Visible PE of fugitive dust from wood waste storage Silo (B) load-out shall not exceed ten percent opacity as a three-minute average.</p> <p>Best available control measures that are sufficient to eliminate visible emissions of fugitive dust.</p> <p>See b.(2)a.-d. below.</p>
b.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The woodworking and material handling operations that are covered by this permit and subject to the following requirements are listed below:

Wood waste storage Silo (B), hydraulically loaded from the baghouse  
 Silo (B) load-out into trucks via gravity  
 Double-end trim saw  
 Moulder  
 5 Chuckers  
 Sander

- b. The permittee shall employ best available control measures for the above-identified woodworking operations and wood waste storage bin load-out for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee will maintain 99% baghouse capture efficiency and 70% building capture efficiency of fugitive dust from the wood waste generated by the double-end trim saw, one moulder, five chuckers, and one sander. The wood waste shall be vented to a cyclone and then to the EF 100 baghouse with 99% control efficiency. Wood waste from the EF 100 baghouse shall be hydraulically transported to Silo B then emptied by gravity into mobile trailers as needed. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.



- c. For each woodworking operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the daily VE checks conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measure(s) is unnecessary.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- e. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Noble County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
- f. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable ranges specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed



the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 4.0 to 6.0 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (2) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible emissions of from the baghouse stack and building egress points (i.e., building windows, doors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.
- (3) For each portion of the wood waste storage Silo (B) load-out that is not adequately enclosed, the permittee shall perform daily inspections of the wood waste storage bin load-out operations in accordance with the following minimum frequencies in order to determine if control measures need to be implemented:

<u>Material handling operation</u>	<u>Minimum Inspection Frequency</u>
Wood waste storage silo load-out	During each load-out event

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. The inspections shall be performed during representative, normal operating conditions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements



(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

PE from the baghouse stack serving emissions unit F002 and F003 shall not exceed 0.52 lb/hr and 2.28 TPY.

Applicable Compliance Methods:

The lb/hr emissions limitation was based on the emissions data of 411.00 lb PE/hr uncontrolled with a cyclone capture efficiency of 85% and 85% control and a baghouse efficiency of 100% capture and 99% control, as submitted in the application.

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance the annual emissions limitation was established by the following one-time calculation:

$$411.00 \text{ lb PE/hr} - (411.00 \text{ lb PE/hr})(1-0.85) = 52.40 \text{ lb PE/hr}$$

$$(52.40 \text{ lb PE/hr})(1-0.99) = 0.52 \text{ lb PE/hr}$$

$$(0.52 \text{ lb PE/hr})(8760 \text{ hr/yr})(0.0005 \text{ ton/lb}) = 2.28 \text{ TPY}$$

b. Emissions Limitation:

Total fugitive PE from the woodworking operations (including trimming, cutting, sanding), woodchipping (F003), and Silo (B) load-out operations shall not exceed 81.95TPY.

Applicable Compliance Method:

The annual emissions limitation was established by the following one-time calculation:

Stack  $PE_{FUG}$

$$(411.00 \text{ lb PE/hr})(1-0.85) = 61.65 \text{ lb PE/hr}$$

$$(61.65 \text{ lb PE/hr}) - [(61.65)(0.70)] = 18.49 \text{ lb PE/hr}$$

$$(18.49 \text{ lb PE/hr})(8,760 \text{ hr/yr})(0.0005 \text{ ton/lb}) = 80.99 \text{ TPY}$$

Silo (B)  $PE_{FUG}$



$$(3,878.70 \text{ TPY})(2.0 \text{ lb PE/ton}) = 7757.4 \text{ lb PE/yr}$$

$$7,757.4 \text{ lb PE/yr} / 8,760 \text{ hr} = 0.89 \text{ lb PE/hr}$$

$$(0.89 \text{ lb/hr})(1-0.75) = 0.22 \text{ lb PE/hr}$$

$$(0.22 \text{ lb PE/hr})(8,760 \text{ hr/yr})(0.0005 \text{ ton/lb}) = 0.96 \text{ TPY}$$

Total PE<sub>FUG</sub>

$$80.99 \text{ TPY} + 0.96 \text{ TPY} = 81.95 \text{ TPY}$$

Where:

411.00 lb PE/hr = uncontrolled emissions from woodworking operations, as submitted in the application;  
70% = control efficiency of building

3,878.70 TPY = maximum potential of wood waste unloaded from Silo B, as submitted in the application;  
2.0 lb PE/ton = uncontrolled emission factor for wood waste load-out, RACM, table 2.17-1 (9/1980);  
75% = control efficiency for load-out using a telescopic tube (minimized drop height), RACM, table 2.17-3 (9/1980).

c. Emissions Limitation:

There shall be no visible PE from the baghouse stack and no visible PE of fugitive dust from building egress points (i.e., building windows, doors, etc.) serving this emissions unit

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 22.

d. Emissions Limitation:

Visible PE of fugitive dust from wood waste storage Silo (B) load-out shall not exceed ten percent opacity as a three-minute average.

Applicable Compliance Method:

If required, visible PE shall be determined according to USEPA Method 9.

g) Miscellaneous Requirements

(1) None.



**3. F003, Wood Chipper**

**Operations, Property and/or Equipment Description:**

Wood chipper operations enclosed in a building and controlled with an exterior cyclone with 85% capture efficiency and 85% control efficiency, a fabric filter baghouse with a capture efficiency of 100% and 99% control efficiency and a building control of 70%.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) from the baghousestack serving emissions units F002 and F003 shall not exceed 0.52 lb/hr and 2.28 TPY.</p> <p>Total fugitive PE from the woodworking operations (including trimming, cutting, sanding), wood chipping (F003) and Silo (B) load-out operations shall not exceed 81.95TPY.</p> <p>There shall be no visible PE from the baghouse stack and no visible PE of fugitive dust from building egress points (i.e., building windows, doors, etc.) serving this emissions unit.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Best available control measures that are sufficient to eliminate visible emissions of fugitive dust.  See b.(2)a.-d. below.
b.	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The woodworking and material handling operations that are covered by this permit and subject to the following requirements are listed below:

Wood Chipper

- b. The permittee shall employ best available control measures for the above-identified wood chipper for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permit application, the permittee will maintain 99% baghouse capture efficiency and 70% building capture efficiency of fugitive dust from the wood waste generated by the wood chipper. The wood waste shall be vented to a cyclone and then to the EF 100 baghouse with 99% control efficiency. Wood waste from the EF 100 baghouse shall be hydraulically transported to Silo B then emptied by gravity into mobile trailers as needed. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. For each operation that is not adequately enclosed, the above-identified control measures shall be implemented if the permittee determines, as a result of the daily VE checks conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during the operation of the material handling operations until further observation confirms that use of the control measure(s) is unnecessary.
- d. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.



- e. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08 (it is located in Noble County). Therefore, the requirements of OAC rule 3745-17-08(B) do not apply to this emissions unit.
  - f. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(B) pursuant to OAC rule 3745-17-07(B)(11)(e).
- c) Operational Restrictions
- (1) None.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop, in inches of water, across the baghouse during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop, in inches of water, across the baghouse on a daily basis.

Whenever the monitored value for the pressure drop deviates from the range specified below, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation: the date and time the deviation began and the magnitude of the deviation at that time, the date(s) the investigation was conducted, the names of the personnel who conducted the investigation, and the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken: a description of the corrective action, the date it was completed, the date and time the deviation ended, the total period of time (in minutes) during which there was a deviation, the pressure drop readings immediately after the corrective action, and the names of the personnel who performed the work. Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The acceptable range for the pressure drop across the baghouse is 4.0 to 6.0 inches of water.

This range is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the range based upon information obtained during future particulate emission tests that demonstrate compliance with the allowable particulate emission rate for this emissions unit. In addition, approved revisions



to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (2) The permittee shall perform daily checks, when the emissions unit is in operation, for any visible emissions from the baghouse stack and building egress points (i.e., building windows, doors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. the total duration of any visible emissions incident; and
  - c. any corrective actions taken to eliminate the visible emissions.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation:

PE from the baghouse stack serving emissions unit F002 and F003 shall not exceed 0.52 lb/hr and 2.28 TPY.

Applicable Compliance Methods:

The lb/hr emissions limitation was based on the emissions data of 411.00 lb PE/hr uncontrolled with a cyclone capture efficiency of 85% and 85% control and a baghouse efficiency of 100% capture and 99% control, as submitted in the application.

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

Compliance the annual emissions limitation was established by the following one-time calculation:



$$411.00 \text{ lb PE/hr} - (411.00 \text{ lb PE/hr})(1-0.85) = 52.40 \text{ lb PE/hr}$$

$$(52.40 \text{ lb PE/hr})(1-0.99) = 0.52 \text{ lb PE/hr}$$

$$(0.52 \text{ lb PE/hr})(8760 \text{ hr/yr})(0.0005 \text{ ton/lb}) = 2.28 \text{ TPY}$$

b. Emissions Limitation:

Total fugitive PE from the woodworking operations (including trimming, cutting, sanding), woodchipping (F003), and Silo (B) load-out operations shall not exceed 81.95TPY.

Applicable Compliance Method:

The annual emissions limitation was established by the following one-time calculation:

Stack PE<sub>FUG</sub>

$$(411.00 \text{ lb PE/hr})(1-0.85) = 61.65 \text{ lb PE/hr}$$

$$(61.65 \text{ lb PE/hr}) - [(61.65)(0.70)] = 18.49 \text{ lb PE/hr}$$

$$(18.49 \text{ lb PE/hr})(8,760 \text{ hr/yr})(0.0005 \text{ ton/lb}) = 80.99 \text{ TPY}$$

Silo (B) PE<sub>FUG</sub>

$$(3,878.70 \text{ TPY})(2.0 \text{ lb PE/ton}) = 7757.4 \text{ lb PE/yr}$$

$$7,757.4 \text{ lb PE/yr} / 8,760 \text{ hr} = 0.89 \text{ lb PE/hr}$$

$$(0.89 \text{ lb/hr})(1-0.75) = 0.22 \text{ lb PE/hr}$$

$$(0.22 \text{ lb PE/hr})(8,760 \text{ hr/yr})(0.0005 \text{ ton/lb}) = 0.96 \text{ TPY}$$

Total PE<sub>FUG</sub>

$$80.99 \text{ TPY} + 0.96 \text{ TPY} = 81.95 \text{ TPY}$$

Where:

411.00 lb PE/hr = uncontrolled emissions from woodworking operations, as submitted in the application;

70% = control efficiency of building

3,878.70 TPY = maximum potential of wood waste unloaded from Silo B, as submitted in the application;

2.0 lb PE/ton = uncontrolled emission factor for wood waste load-out, RACM, table 2.17-1 (9/1980);

75% = control efficiency for load-out using a telescopic tube (minimized drop height), RACM, table 2.17-3 (9/1980)..



c. Emissions Limitation:

There shall be no visible PE from the baghouse stack and no visible PE of fugitive dust from building egress points (i.e., building windows, doors, etc.) serving this emissions unit

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 22.

g) Miscellaneous Requirements

(1) None.



**4. K001, Coating Operations**

**Operations, Property and/or Equipment Description:**

Handle coating operation with an airless curtain application of low VOC coatings with maximum coating usage rate of 1.42 gal/hr and maximum VOC content rate of 0.34 lb/gal.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	<p>Volatile organic compound (VOC) emissions from coatings shall not exceed 0.48 pounds per hour and 2.1 tons per year.</p> <p>See b)(2)a. below</p>
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/01/06	See b)(2)b. below

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulation for NAAQS pollutant emissions less than ten tons per year. However, that rule revision has



not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revision to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limits/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC and PE emissions from this air contaminant source since the uncontrolled potential to emit for VOC and PE is less than 10 tons/yr.

- c. Pursuant to OAC rule 3745-17-07(A)(3)(h), the visible PE limitations in OAC rule 3745-17-07(A)(1) do not apply to a source that is not subject to a mass emission limitation in OAC rule 3745-17-11(B).
- d. Pursuant to OAC rule 3745-17-07(A)(1)(j), PE limitations in OAC rule 3745-17-11 do not apply to a source that employs an airless coating operation.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for this emissions unit:
  - a. the name and identification number of each coating, as applied;
  - b. the mass of VOC per volume (excluding water and exempt solvents) and the volume of each coating (excluding water and exempt solvents), as applied; and
  - c. the total VOC emissions from the coatings employed, as calculated using the following equation:

$$T = A_1B_1 + A_2B_2 + \dots + A_nB_n$$

where:

T = total VOC emissions from the combined coating lines before the application of capture systems and control devices, in units of pounds per day;

n = number of different coatings applied in the coating lines at the facility;

i = subscript denoting an individual coating;



$A_i$  = mass of VOC per volume of coating (i) (excluding water and exempt solvents), as applied, in units of pounds VOC per gallon; and

$B_i$  = volume of coating (i) (excluding water and exempt solvents), as applied, in units of gallons per day.

- (2) The permittee shall collect and record the following information on a monthly basis for the coating and cleanup materials applied in this emissions unit:
- a. the total VOC emissions from the coatings applied during the month, i.e., the summation of the VOC emissions calculated for "T" above for each day of operations; or the maximum VOC emissions calculated for "T" during the month times the number of days of operation;
  - b. the name and identification of each cleanup material employed;
  - c. the VOC content of each cleanup material, in pounds per gallon;
  - d. the number of gallons of each cleanup material employed;
  - e. the total VOC emission rate from all cleanup materials, i.e., the summation of the products of "e" times "f" for all cleanup materials employed; and
  - f. the total VOC emissions from all coatings and cleanup materials employed, in pounds or tons, the sum of "a" and "e".

These monthly records shall be maintained for the purpose of determining annual VOC emissions for the emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall also submit annual reports that specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:



- a. Emissions Limitation:  
VOC emissions from coating shall not exceed 0.48 pounds per hour and 2.1 tons per year.

Applicable Compliance Method:

Compliance with the pound per hour emissions limitation shall be demonstrated by the following one-time calculations based on a maximum stain use rate of 1.4 gallons/hour and a maximum coating VOC content of 0.34 pounds per gallon, as submitted in the application.

$$(1.42 \text{ gal/hr})(0.34 \text{ lb VOC/gal}) = 0.48 \text{ lb VOC/hr}$$

If required, organic compound emissions shall be determined according to test Methods 1 - 4, and 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The annual emissions limitation is based on a maximum annual coating use rate of 8,760 gallons per year (per permittee's application) :

$$(0.48 \text{ lb VOC/hr})(8,760 \text{ hr/yr})(0.0005 \text{ ton/lb}) = 2.1 \text{ TPY}$$

Compliance with the annual emissions limitation shall be demonstrated by the recordkeeping in d)(2).

- g) Miscellaneous Requirements

- (1) None.