State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

12/18/02

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

15-76-08-0056
The Longaberger Company
Candace G Robinson
1500 East Main Street
P O Box 3400
Newark, OH 43058-3400

Dear Candace G Robinson:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact Canton Division of Air Pollution Control.

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Canton Division of Air Pollution Control
File, DAPC PMU

State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: **12/18/02**	Effective Date: **01/08/02**	Expiration Date: **12/18/07**

This document constitutes issuance of a Title V permit for Facility ID: 15-76-08-0056 to:
The Longaberger Company
224 East Maple Street
P O Box 670
Hartville, OH 44632-8805

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B003 (25.3MM BTU/hr Wood Waste Boiler) Active wood waste fired boiler used to produce	steam; has natural gas backup system for emergency use

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Canton Division of Air Pollution Control
420 Market Avnue N.
Canton, OH 44702-1544
(330) 489-3385

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.
ii. The date(s) analyses were performed.
iii. The company or entity that performed the analyses.
iv. The analytical techniques or methods used.
v. The results of such analyses.
vi. The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c. The permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

(a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six

months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) ,(ii) and (iii))

(b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

iv. Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the

report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit(s) or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.
(Authority for term: OAC rule 3745-77-07(A)(4))

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the 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 federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and

reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

(Authority for term: OAC rule 3745-77-07(A)(8))

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three 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 paragraph (E)(1) of OAC rule 3745-77-08.

b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

12. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
ii. Compliance certifications shall include the following:
(a) An identification of each term or condition of this permit that is the basis of the certification.
(b) The permittee's current compliance status.
(c) Whether compliance was continuous or intermittent.
(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

13. Permit Shield

a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification

under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

16. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph

(I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)
(Authority for term: OAC rule 3745-77-07(I))

17. Compliance Method Requirements

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 (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

B. *State Only Enforceable Section*

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee

shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

3. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

4. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

5. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

6. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

2. The permittee shall comply with all applicable provisions specified in 40 CFR Part 82, Subparts B and F as related to the operations at this facility.

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

B002: 800,000 Btu/hr gas-fired veneer dryer;
F001: roadways and parking lots;
F002: sawmill, woodworking and debarking; and
P001: sawmill for wood cants.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: 25.3MM BTU/hr Wood Waste Boiler (B003)

Activity Description: Active wood waste fired boiler used to produce steam; has natural gas backup system for emergency use

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
25.3 mmBtu/hr wood waste-fired boiler (emergency natural gas backup) controlled with primary and secondary multiclone dust collectors	OAC rule 3745-31-05(A)(3) (PTI 15-01243)	When firing wood waste: 0.30 pound of particulate emissions (PE) per mmBtu of actual heat input 0.46 pound of nitrogen oxides (NOx) per mmBtu of actual heat input 1.74 pounds of carbon monoxide (CO) per mmBtu of actual heat input 0.010 pound of sulfur dioxide (SO2) per mmBtu of actual heat input 0.028 pound of organic compounds (OC) per mmBtu of actual heat input When firing natural gas: 0.18 pound of PE per hour 3.29 pounds of NOx per hour 0.76 pound of CO per hour 0.013 pound of SO2 per hour 0.13 pound of OC per hour See A.I.2.a and A.I.2.b below.
	OAC rule 3745-17-07(A)	See A.I.2.c below.
	OAC rule 3745-17-10(C)(1)	See A.I.2.d below.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-10(B)(1)	See A.I.2.e below.
	OAC rule 3745-21-08(B)	See A.I.2.f below.
	OAC rule 3745-23-06(B)	See A.I.2.f below.
	40 CFR Part 60, Subpart Dc	See A.I.2.g below.

2. Additional Terms and Conditions

2.a This emissions unit shall not exceed the following emission limitations on an annual basis:

pollutant	tons per year
PE	33.24
SO2	1.11
NOx	51.07
CO	192.72
OC	3.11

2.b Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity. This emission limitation applies at all times, regardless of the fuel burned.

2.c The visible particulate emission limitations specified in OAC rule 3745-17-07(A) are less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.d The emission limitation specified in OAC rule 3745-17-10(C)(1), while this emissions unit is firing wood waste, is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.e The emission limitation specified in OAC rule 3745-17-10(B)(1), while this emissions unit is firing natural gas, is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2.f The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively, by committing to comply with the best available technology requirement established in Permit to Install 15-01243.

2.g Although this is an applicable rule, this emissions unit is exempt from the SO2 standard because wood and natural gas are the only fuels fired. This emissions unit is also exempt from the particulate standards because the boiler's heat input capacity is less than 30 mmBtu/hr.

II. Operational Restrictions

1. All emissions from this emissions unit shall be vented to the primary and secondary multiclone dust collectors.

2. The pressure drop across the primary and secondary dust collectors shall be maintained within the range of 0.5 to 4.0 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the following information for this emissions unit:

a. the operating hours while firing natural gas; and

b. the operating hours while firing wood waste.

III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall perform daily checks, when the emissions unit is in operation and firing wood waste 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 using the operator's experience or previous emission testing conditions as a reference:

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 emission incident; and
e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

Note: The presence of any visible particulate emissions may or may not indicate a violation of the particulate mass emission limitation and/or visible particulate emission limitation. If required by the Ohio EPA or the Canton local air agency, compliance with the particulate mass emission limitation and the visible particulate emission limitation shall be determined by performing concurrent mass emission tests and visible emissions observations, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission observations shall be used in determining whether or not the presence of any visible particulate emissions is indicative of a possible violation of the particulate mass emission limitation and/or visible particulate emission limitation.

Persons responsible for performing the visible emissions observations should acquire basic training in the general principles and practices of "reading" opacity. It is suggested that the observer be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to the sun, wind, and the presence of uncombined water.

3. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the dust collectors while the emissions unit is in operation. The monitoring equipment shall be capable of accurately measuring the desired parameter. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each dust collector at least once a shift while the emissions unit is in operation.

4. The permittee shall keep an operations and maintenance log to report the findings of regularly scheduled inspections of the dust collectors. The inspections should include a thorough examination of the casing, flue work and expansion joints, hoppers and rotary valves and instrumentation. At least twice a year, the internals of the dust collectors shall be inspected for pluggage, excessive erosion or corrosion or thermal or mechanical distortions. The log shall contain records of repairs or documentation of equipment malfunctions. The log shall be made available for review by a representative of the Ohio EPA.

IV. Reporting Requirements

1. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

IV. Reporting Requirements (continued)

2. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across each dust collector did not comply with the allowable range specified above. The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

3. The permittee shall also submit annual reports that specify the total particulate, SO2, NOx, CO, and OC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27%. This emission limitation applies at all times, regardless of the fuel burned.

Applicable Compliance Method:
Compliance shall be demonstrated through visible particulate emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

1.b Emission Limitation:
0.30 pound of PE per mmBtu of actual heat input while firing wood waste

Applicable Compliance Method:
Compliance shall be demonstrated through emission tests as specified in section A.V.2.

1.c Emission Limitation:
33.24 tons of PE per year

Applicable Compliance Method:
Compliance may be demonstrated based upon the summation of the results of the following calculations:

i. (0.30 lb/mmBtu) x (25.3 mmBtu/hr) x (annual operating hours while firing wood waste) x (0.0005 ton/lb) = tpy

ii. (0.18 lb/hr) x (annual operating hours while firing natural gas) x (0.0005 ton/lb) = tpy

1.d Emission Limitation:
0.46 pound of NOx per mmBtu of actual heat input while firing wood waste

Applicable Compliance Method:
Compliance may be demonstrated by multiplying an emission factor of 3.6 pounds of NOx per ton of wood waste fired by the emissions unit's maximum hourly wood waste consumption rate (3.24 tons/hr), and then dividing by the emissions unit's maximum heat input capacity (25.3 mmBtu/hr).

The NOx emission factor was obtained from the USEPA reference document AP-42 : Compilation of Air Pollution Emission Factors, 5th Edition, Chapter 1, Section 1.6, Table 1.6-2, dated February, 1999.

If required, compliance shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

V. Testing Requirements (continued)

1.e Emission Limitation:
51.07 tons of NOx per year

Applicable Compliance Method:
Compliance may be demonstrated based upon the summation of the results of the following calculations:

i. (0.46 lb/mmBtu) x (25.3 mmBtu/hr) x (annual operating hours while firing wood waste) x (0.0005 ton/lb) = tpy

ii. (3.29 lbs/hr) x (annual operating hours while firing natural gas) x (0.0005 ton/lb) = tpy

1.f Emission Limitation:
1.74 pounds of CO per mmBtu of actual heat input while firing wood waste

Applicable Compliance Method:
Compliance may be demonstrated by multiplying an emission factor of 13.6 pounds of CO per ton of wood waste fired by the emissions unit's maximum hourly wood waste consumption rate (3.24 tons/hr), and then dividing by the emissions unit's maximum heat input capacity (25.3 mmBtu/hr.)

The CO emission factor was obtained from the USEPA reference document AP-42 : Compilation of Air Pollution Emission Factors, 5th Edition, Chapter 1, Section 1.6, Table 1.6-2, dated February, 1999.

If required, compliance shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

1.g Emission Limitation:
192.72 tons of CO per year

Applicable Compliance Method:
Compliance may be demonstrated based upon the summation of the results of the following calculations:

i. (1.74 lbs/mmBtu) x (25.3 mmBtu/hr) x (annual operating hours while firing wood waste) x (0.0005 ton/lb) = tpy

ii. (0.76 lb/hr) x (annual operating hours while firing natural gas) x (0.0005 ton/lb) = tpy

1.h Emission Limitation:
0.01 pound of SO2 per mmBtu of actual heat input while firing wood waste

Applicable Compliance Method:
Compliance may be demonstrated by multiplying an emission factor of 0.075 pound of SO2 per ton of wood waste fired by the emissions unit's maximum hourly wood waste consumption rate (3.24 tons/hr), and then dividing by the emissions unit's maximum heat input capacity (25.3 mmBtu/hr.)

The SO2 emission factor was obtained from the USEPA reference document AP-42 : Compilation of Air Pollution Emission Factors, 5th Edition, Chapter 1, Section 1.6, Table 1.6-2, dated February, 1999.

If required, compliance shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

V. Testing Requirements (continued)

1.i Emission Limitation:
1.11 tons of SO2 per year

Applicable Compliance Method:
Compliance may be demonstrated based upon the summation of the results of the following calculations:

i. (0.01 lb/mmBtu) x (25.3 mmBtu/hr) x (annual operating hours while firing wood waste) x (0.0005 ton/lb) = tpy

ii. (0.013 lb/hr) x (annual operating hours while firing natural gas) x (0.0005 ton/lb) = tpy

1.j Emission Limitation:
0.028 pound of OC per mmBtu of actual heat input while firing wood waste

Applicable Compliance Method:
Compliance may be demonstrated by multiplying an emission factor of 0.22 pound of OC per ton of wood waste fired by the emissions unit's maximum hourly wood waste consumption rate (3.24 tons/hr), and then dividing by the emissions unit's maximum heat input capacity (25.3 mmBtu/hr.)

The OC emission factor was obtained from the USEPA reference document AP-42 : Compilation of Air Pollution Emission Factors, 5th Edition, Chapter 1, Section 1.6, Table 1.6-3, dated February, 1999.

If required, compliance shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

1.k Emission Limitation:
3.11 tons of OC per year

Applicable Compliance Method:
Compliance may be demonstrated based upon the summation of the results of the following calculations:

i. (0.028 lb/mmBtu) x (25.3 mmBtu/hr) x (annual operating hours while firing wood waste) x (0.0005 ton/lb) = tpy

ii. (0.13 lb/hr) x (annual operating hours while firing natural gas) x (0.0005 ton/lb) = tpy

1.l Emission Limitation:
0.18 pound of PE per hour while firing natural gas

Applicable Compliance Method:
Compliance may be demonstrated by multiplying an emission factor of 7.6 pounds of PE per mmscf by the emissions unit's maximum hourly natural gas usage rate (.022917 mmscf/hr.)

The PE factor was obtained from the USEPA reference document AP-42 : Compilation of Air Pollution Emission Factors, 5th Edition, Chapter 1, Section 1.4, Table 1.4-2, dated July, 1998.

If required, compliance shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

This AP-42-based emission limitation reflects the emissions unit's potential to emit while firing natural gas.

V. Testing Requirements (continued)

1.m Emission Limitation:
3.29 pounds of NOx per hour while firing natural gas

Applicable Compliance Method:
Compliance may be demonstrated by multiplying an emission factor of 100 pounds of NOx per mmscf by the emissions unit's maximum hourly natural gas usage rate (.022917 mmscf/hr.)

The NOx emission factor was obtained from the USEPA reference document AP-42 : Compilation of Air Pollution Emission Factors, 5th Edition, Chapter 1, Section 1.4, Table 1.4-1, dated July, 1998.

If required, compliance shall also be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

This AP-42-based emission limitation reflects the emissions unit's potential to emit while firing natural gas.

1.n Emission Limitation:
0.76 pound of CO per hour while firing natural gas

Applicable Compliance Method:
Compliance may be demonstrated by multiplying an emission factor of 84 pounds of CO per mmscf by the emissions unit's maximum hourly natural gas usage rate (.022917 mmscf/hr.)

The CO emission factor was obtained from the USEPA reference document AP-42 : Compilation of Air Pollution Emission Factors, 5th Edition, Chapter 1, Section 1.4, Table 1.4-1, dated July, 1998.

If required, compliance shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

This AP-42-based emission limitation reflects the emissions unit's potential to emit while firing natural gas.

1.o Emission Limitation:
0.013 pound of SO2 per hour while firing natural gas

Applicable Compliance Method:
Compliance may be demonstrated by multiplying an emission factor of 0.6 pound of SO2 per mmscf by the emissions unit's maximum hourly natural gas usage rate (.022917 mmscf/hr.)

The SO2 emission factor was obtained from the USEPA reference document AP-42 : Compilation of Air Pollution Emission Factors, 5th Edition, Chapter 1, Section 1.4, Table 1.4-2, dated July, 1998.

If required, compliance shall also be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

This AP-42-based emission limitation reflects the emissions unit's potential to emit while firing natural gas.

V. Testing Requirements (continued)

1.p Emission Limitation:
0.13 pound of OC per hour while firing natural gas

Applicable Compliance Method:
Compliance may be demonstrated by multiplying an emission factor of 11 pounds of OC per mmscf by the emissions unit's maximum hourly natural gas usage rate (.022917 mmscf/hr.)

The OC emission factor was obtained from the USEPA reference document AP-42 : Compilation of Air Pollution Emission Factors, 5th Edition, Chapter 1, Section 1.4, Table 1.4-2, dated July, 1998.

If required, compliance shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

This AP-42-based emission limitation reflects the emissions unit's potential to emit while firing natural gas.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted within 6 months after issuance of the permit and the frequency of additional tests will be determined based upon the results of the initial emission testing. If the initial emission test results are less than 95% of the allowable emission rate, the next emission test will be conducted in 2 1/2 years; otherwise, the next emission test will be required one year after the initial emission test.

The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates while the emissions unit is firing wood waste.

The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate for particulates: Methods 1 through 5 of 40 CFR Part 60, Appendix A. Alternative USEPA-approved test methods may be used with prior approval from the Ohio EPA.

The tests shall be conducted while the emissions unit is operating at or near its maximum heat input capacity (i.e., 25.3 mmBtu/hr) and while the emissions unit is operating at or near one-half of its maximum heat input capacity (i.e., approximately 12.5 mmBtu/hr), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. The emission tests shall consist of a minimum of 3 sampling runs for each operating scenario.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report of the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

****

THIS IS THE LAST PAGE OF THE PERMIT

****