



State of Ohio Environmental Protection Agency

Street Address:
122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049

**RE: DRAFT PERMIT TO INSTALL
FULTON COUNTY
Application No: 03-3201**

CERTIFIED MAIL

DATE: August 18, 1999

Sauder Woodworking
John Schlatter
502 Middle Street
Archbold, OH 43502

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1000** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, buy 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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
DAPC, NWDO
Indiana Office of Air Management
Michigan Department of Environmental Quality

STATE OF OHIO ENVIRONMENTAL PROTECTION

AGENCY
Permit To Install

**Terms and
Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 03-3201

Application Number: 03-3201
APS Premise Number: 0326000160
Permit Fee: **To be entered upon final issuance**
Name of Facility: Sauder Woodworking
Person to Contact: John Schlatter
Address: 502 Middle Street
Archbold, OH 43502

Location of proposed air contaminant source(s) [emissions unit(s)]:
**801 W Barre Road
Archbold, Ohio**

Description of proposed emissions unit(s):
LAMINATOR AND WOOD WASTE HANDLING SYSTEMS.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS**A. State and Federally Enforceable Permit To Install General Terms and Conditions****1. Monitoring and Related Recordkeeping 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.
- 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, 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (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. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the

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submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. 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. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.14 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, 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. 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, recordkeeping, 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.
- 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 are true, accurate, and complete.

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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 emission unit(s) that is (are) served by such control system(s).

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.

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.

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.

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. 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

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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.

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. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.

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- 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 appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
 - i. Compliance certifications shall be submitted on an annual basis unless the applicable requirement specifies more frequent submissions.
 - 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

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may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

10. 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.

11. Title V Permit To Operate Application

Pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit.

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B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) 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. 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.)

3. 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.

4. 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.

5. 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).

6. 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.

7. 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.

8. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

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9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute

an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the

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source.

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14. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable 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.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PM10	32.4
VOC	1.6

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

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.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
72,000 acfm wood waste handling system	40 CFR 52.21 OAC rule 3745-31-(10-20)	0.0030 grain/dscf
	OAC rule 3745-17-11 (B)(1)	(none see A.I.2.a.)
	OAC rule 3745-17-07 (A)(1)	(none see A.I.2.b.)

2. Additional Terms and Conditions

2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. In addition, this facility is located in a county listed in OAC rule 3745-17-11(B)(2). Therefore, pursuant to OAC rule 3745-17-11(A)(2)(b)(ii), Figure II in OAC rule 3745-17-11 does not apply.

2.b Per the above condition, OAC rule 3745-17-11 does not apply to this emissions unit. Therefore, pursuant to OAC rule 3745-17-07(A)(3)(h), OAC rule 3745-17-07 does not apply.

II. Operational Restrictions

The pressure drop across the wood waste handling system shall be maintained within the range of 1.5 to 8.0 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

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Saude

PTI A₁

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The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the wood waste handling system while it is in operation. The monitoring equipment shall be installed,

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calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a weekly basis.

IV. Reporting Requirements

The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the wood waste handling system did not comply with the allowable range specified above.

V. Testing Requirements

Compliance with the emission limitations established for emissions unit P407 shall be determined in accordance with the following methods:

Emission Limitation: 0.0030 gr/dscf

Applicable Compliance Method: The 0.0030 grain/dry standard cubic foot limit is the established outlet grain loading concentration for the wood handling systems at the Sauder Woodworking facility. If required, compliance with the outlet grain loading concentration shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall update the existing preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The quality assurance/quality control plan and any logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying this office in the event of an equipment malfunction.
2. This emissions unit as described in this Permit to Install (PTI) is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency (U.S. EPA). The authority to apply and enforce the PSD regulations has been delegated to the OEPA.

In accordance with 40 CFR 124.15, 124.19, and 124.20, the following shall apply:

- a. the effective date of the permit shall be 30 days after the service of notice to any public

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Emissions Unit ID: **P407**

commentors the final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and,

- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied. Appeals will be addressed to:

United States Environmental Protection Agency
Environmental Appeals Board
401 M Street, SW (MC-113do)
Washington, DC 21460

Saude

PTI A₁Emissions Unit ID: **P407****Date: To be entered upon final issuance****B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
72,000 acfm wood waste handling system	OAC rule 3745-31-05	1.85 lbs PE/hr & 8.11 tons PE/yr 0% opacity, as a 6-minute average

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Record Keeping Requirements

None.

IV. Reporting Requirements

The actual annual emissions data for the emissions unit shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

V. Testing Requirements

Compliance with the emission limitations established for emissions unit P407 shall be determined in accordance with the following methods:

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Emission Limitation: 1.85 lbs PE/hr & 8.1 tons PE/yr

Applicable Compliance Method: The 0.0030 grain/dry standard cubic foot limit in the State and Federally enforceable section of this permit is the established outlet grain loading concentration for the wood handling systems at the Sauder Woodworking facility. The lbs/hr & TPY limits are derived from multiplying the established grain loading by the maximum volumetric air flow (72,000 acfm), using the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acf, 60 minutes/hr, and the emissions unit's maximum operating schedule of 8760 hrs/yr. Therefore, compliance with allowable mass emission rates will be demonstrated by the company maintaining compliance with the allowable outlet grain loading concentration for this emissions unit.

Emission Limitation: 0% opacity, as a six-minute average

Applicable Compliance Method: Method 9 of 40 CFR Part 60, Appendix A

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
72, 000 acfm wood waste handling system	40 CFR 52.21 OAC rule 3745-31-(10-20)	0.0030 grain/dscf
	OAC rule 3745-17-11 (B)(1)	(none see A.I.2.a.)
	OAC rule 3745-17-07 (A)(1)-(3)	(none see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. In addition, this facility is located in a county listed in OAC rule 3745-17-11(B)(2). Therefore, pursuant to OAC rule 3745-17-11(A)(2)(b)(ii), Figure II in OAC rule 3745-17-11 does not apply.
- 2.b Per the above condition, OAC rule 3745-17-11 does not apply to this emissions unit. Therefore, pursuant to OAC rule 3745-17-07(A)(3)(h), OAC rule 3745-17-07 does not apply.

II. Operational Restrictions

The pressure drop across the wood waste handling system shall be maintained within the range of 1.5 to 8.0 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the wood waste handling system while it is in operation. The monitoring equipment shall be installed,

Emissions Unit ID: P509

calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop on a weekly basis.

IV. Reporting Requirements

The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the wood handling system did not comply with the allowable range specified above.

V. Testing Requirements

Compliance with the emission limitations established for emissions unit P407 shall be determined in accordance with the following methods:

Emission Limitation: 0.0030 gr/dscf

Applicable Compliance Method: The 0.0030 grain/dry standard cubic foot limit is the established outlet grain loading concentration for the wood handling systems at the Sauder Woodworking facility. If required, compliance with the outlet grain loading concentration shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall update the existing preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The quality assurance/quality control plan and any logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying this office in the event of an equipment malfunction.
2. This emissions unit as described in this PTI is subject to the applicable provisions of the PSD regulations as promulgated by the U.S. EPA. The authority to apply and enforce the PSD regulations has been delegated to the OEPA.

In accordance with 40 CFR 124.15, 124.19, and 124.20, the following shall apply:

- a. the effective date of the permit shall be 30 days after the service of notice to any public commentors the final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and,

Date: To be entered upon final issuance

- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Appeals will be addressed to:

United States Environmental Protection Agency
Environmental Appeals Board
401 M Street, SW (MC-113do)
Washington, DC 21460

Date: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
72,000 acfm wood waste handling system	OAC rule 3745-31-05	1.85 lbs PE/hr & 8.11 tons PE/yr 0% opacity, as a 6-minute average

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Record Keeping Requirements

None.

IV. Reporting Requirements

The actual annual emissions data for the emissions unit shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

V. Testing Requirements

Compliance with the emission limitations established for emissions unit P509 shall be determined in accordance with the following methods:

Sauder Woodworking

DTI Application: 03 2201

Facility ID: 0326000160

Emissions Unit ID: P509

Emission Limitation: 1.85 lbs PE/hr & 8.1 tons PE/yr

Applicable Compliance Method: The 0.0030 grain/dry standard cubic foot limit in the State and Federally enforceable section of this permit is the established outlet grain loading concentration for the wood handling systems at the Sauder Woodworking facility. The lbs/hr & TPY limits are derived from multiplying the established grain loading by the maximum volumetric air flow (72,000 acfm), using the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acf, 60 minutes/hr, and the emissions unit's maximum operating schedule of 8760 hrs/yr. Therefore, compliance with allowable mass emission rates will be demonstrated by the company maintaining compliance with the allowable outlet grain loading concentration for this emissions unit.

Emission Limitation: 0% opacity, as a six-minute average

Applicable Compliance Method: Method 9 of 40 CFR Part 60, Appendix A

VI. Miscellaneous Requirements

None.

Date: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
72, 000 acfm wood waste handling system	40 CFR 52.21 OAC rule 3745-31-(10-20)	0.0030 grain/dscf
	OAC rule 3745-17-11 (B)(1)	(none see A.I.2.a.)
	OAC rule 3745-17-07 (A)(1)	(none see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. In addition, this facility is located in a county listed in OAC rule 3745-17-11(B)(2). Therefore, pursuant to OAC rule 3745-17-11(A)(2)(b)(ii), Figure II in OAC rule 3745-17-11 does not apply.

- 2.b Per the above conditions, OAC rule 3745-17-11 does not apply to this emissions unit. Therefore, pursuant to OAC rule 3745-17-07(A)(3)(h), OAC rule 3745-17-07 does not apply.

II. Operational Restrictions

The pressure drop across the wood waste handling system shall be maintained within the range of 1.5 to 8.0 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

Date: To be entered upon final issuance

The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the wood waste handling system while it is in operation. 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 on a weekly basis.

IV. Reporting Requirements

The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the wood waste handling system did not comply with the allowable range specified above.

V. Testing Requirements

Compliance with the emission limitations established for emissions unit P407 shall be determined in accordance with the following methods:

Emission Limitation: 0.0030 gr/dscf

Applicable Compliance Method: The 0.0030 grain/dry standard cubic foot limit is the established outlet grain loading concentration for the wood handling systems at the Sauder Woodworking facility. If required, compliance with the outlet grain loading concentration shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A, and the frequency determined with OEPA Engineering Guide 16.

VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall update the existing preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The quality assurance/quality control plan and any logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying this office in the event of an equipment malfunction.
2. This emissions unit as described in this Permit to Install is subject to the applicable provisions of the PSD regulations as promulgated by the U.S. EPA. The authority to apply and enforce the PSD regulations has been delegated to the OEPA.

Emissions Unit ID: **P510**

In accordance with 40 CFR 124.15, 124.19, and 124.20, the following shall apply:

- a. the effective date of the permit shall be 30 days after the service of notice to any public commentors the final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service notice; and ,
- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Emissions Unit ID: **P510**

Date: To be entered upon final issuance

Appeals will be addressed to:

United States Environmental Protection Agency
Environmental Appeals Board
401 M Street, SW (MC-113do)
Washington, DC 21460

Date: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
72,000 acfm wood waste handling system	OAC rule 3745-31-05	1.85 lbs PE/hr & 8.11 tons PE/yr 0% opacity, as a 6-minute average

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Record Keeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

Compliance with the emission limitations established for emissions unit P510 shall be determined in accordance with the following methods:

Date: To be entered upon final issuance

Emission Limitation: 1.85 lbs PE/hr & 8.1 tons PE/yr

Applicable Compliance Method: The 0.0030 grain/dry standard cubic foot limit in the State and Federally enforceable section of this permit is the established outlet grain loading concentration for the wood handling systems at the Sauder Woodworking facility. The lbs/hr & TPY limits are derived from multiplying the established grain loading by the maximum volumetric air flow (72,000 acfm), using the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acf, 60 minutes/hr, and the emissions unit's maximum operating schedule of 8760 hrs/yr. Therefore, compliance with allowable mass emission rates will be demonstrated by the company maintaining compliance with the allowable outlet grain loading concentration for this emissions unit.

Emission Limitation: 0% opacity, as a six-minute average

Applicable Compliance Method: Method 9 of 40 CFR Part 60, Appendix A

VI. Miscellaneous Requirements

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
72, 000 acfm wood waste handling system	40 CFR 52.21 OAC rule 3745-31-(10-20)	0.0030 grain/dscf
	OAC rule 3745-17-11 (B)(1)	(none see A.I.2.a.)
	OAC rule 3745-17-07 (A)(1) - (3)	(none see A.I.2.b.)

2. Additional Terms and Conditions

- 2.a** The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 lbs/hr. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II in OAC rule 3745-17-11 does not apply. In addition, this facility is located in a county listed in OAC rule 3745-17-11(B)(2). Therefore, pursuant to OAC rule 3745-17-11(A)(2)(b)(ii), Figure II in OAC rule 3745-17-11 does not apply.
- 2.b** Per the above condition, OAC rule 3745-17-11 does not apply to this emissions unit. Therefore, pursuant to OAC rule 3745-17-07(A)(3)(h), OAC rule 3745-17-07 does not apply.

II. Operational Restrictions

The pressure drop across the wood waste handling system shall be maintained within the range of 1.5 to 8.0 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the wood waste handling system while it is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations,

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instructions, and operating manual(s). The permittee shall record the pressure drop on a weekly basis.

IV. Reporting Requirements

The permittee shall submit pressure drop deviation (excursion) reports that identify that all periods of time during which the pressure drop across the wood waste handling system did not comply with the allowable range specified above.

V. Testing Requirements

Compliance with the emission limitations established for emissions unit P407 shall be determined in accordance with the following methods:

Emission Limitation: 0.0030 gr/dscf

Applicable Compliance Method: The 0.0030 grain/dry standard cubic foot limit is the established outlet grain loading concentration for the wood handling systems at the Sauder Woodworking facility. If required, compliance with the outlet grain loading concentration shall be based on stack testing using the methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A.

VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall update the existing preventative maintenance and malfunction abatement plan/system for the wood waste handling operations at this facility. The plan should clearly document how the permittee maintains the wood waste handling systems in good working order, i.e. the type of inspections done on the equipment as well as the frequency. The quality assurance/quality control plan and any logbooks/records dedicated to the system must be kept on site and available for inspection during regular office hours. This plan should also specify the responsible person(s) for notifying this office in the event of an equipment malfunction.
2. This emissions unit as described in this Permit to Install is subject to the applicable provisions of the PSD regulations as promulgated by the U.S. EPA. The authority to apply and enforce the PSD regulations has been delegated to the OEPA.

In accordance with 40 CFR 124.15, 124.19, and 124.20, the following shall apply:

- a. the effective date of the permit shall be 30 days after the service of notice to any public commentors the final decision to issue, modify or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33

days after the service notice; and,

- b. if an appeal is made to the Environmental Appeals Board of the U.S. EPA, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Emissions Unit ID: **P511**

Date: To be entered upon final issuance

Appeals will be addressed to:

United States Environmental Protection Agency
Environmental Appeals Board
401 M Street, SW (MC-113do)
Washington, DC 21460

Date: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
72,000 acfm wood waste handling system	OAC rule 3745-31-05	1.85 lbs PE/hr & 8.11 tons PE/yr 0% opacity, as a 6-minute average

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Record Keeping Requirements

None.

IV. Reporting Requirements

The actual annual emissions data for the emissions unit shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

V. Testing Requirements

Compliance with the emission limitations established for emissions unit P511 shall be determined in accordance with the following methods:

Date: To be entered upon final issuance

Emission Limitation: 1.85 lbs PE/hr & 8.1 tons PE/yr

Applicable Compliance Method: The 0.0030 grain/dry standard cubic foot limit in the State and Federally enforceable section of this permit is the established outlet grain loading concentration for the wood handling systems at the Sauder Woodworking facility. The lbs/hr & TPY limits are derived from multiplying the established grain loading by the maximum volumetric air flow (72,000 acfm), using the appropriate conversion factors of 7000 grains/lb, 1 dscf/1 acf, 60 minutes/hr, and the emissions unit's maximum operating schedule of 8760 hrs/yr. Therefore, compliance with allowable mass emission rates will be demonstrated by the company maintaining compliance with the allowable outlet grain loading concentration for this emissions unit.

Emission Limitation: 0% opacity, as a six-minute average

Applicable Compliance Method: Method 9 of 40 CFR Part 60, Appendix A

VI. Miscellaneous Requirements

None.

Date: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
hymmen laminator #2	OAC rule 3745-21-07 (G)	none, see A.II.

2. **Additional Terms and Conditions**

- 2.a None.

II. Operational Restrictions

The use of photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit is prohibited.

III. Monitoring and/or Record Keeping Requirements

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

- a. the company identification for each liquid organic material employed in this emissions unit; and,
- b. documentation on whether or not each liquid organic material employed is a photochemically reactive material.

IV. Reporting Requirements

The permittee shall submit deviation (excursion) reports which identify each day during which a photochemically reactive material was employed. The report shall be submitted within 45 days after the deviation occurs.

V. Testing Requirements

None.

Emissions Unit ID: **P512**

Date: To be entered upon final issuance

VI. Miscellaneous Requirements

None.

Date: To be entered upon final issuance

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
hymmen laminator #2	OAC rule 3745-31-05	0.36 lbs Organic Compounds (OC)/hr & 1.6 TPY

2. Additional Terms and Conditions

- 2.a None.

II. Operational Restrictions

None.

III. Monitoring and/or Record Keeping Requirements

The permittee shall collect and record the following information for each month for this emissions unit:

- the company identification for each resin employed;
- the number of gallons of each resin employed;
- the OC content of each resin, in lbs/gallon;
- the total OC emission rate* for all resins, in lbs/month;
- the annual, year to date emissions for the calendar year.

It has been determined that a minimum of 90% of the free formaldehyde in the resin is consumed during the lamination process and is not emitted to the atmosphere. Therefore, the emission rate

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is the # of gallons times OC content times a unitless emission factor of 0.1.

IV. Reporting Requirements

The actual annual emissions data for the emissions unit shall be reported pursuant to the fee emissions report required by OAC rule 3745-78-02(A).

V. Testing Requirements

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

Emission Limitation-

0.36 lb OC/hr

Applicable Compliance Method-

The hourly OC limits are based on each emissions unit's potential to emit i.e., the maximum usage rates of 59.5 gallons of coating per hour at the maximum OC content of 0.06 lbs/gallon, and an emission factor of 0.1. [See condition B(III) above.] Therefore, no daily record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limit.

Emission Limitation-

1.6 TPY of OC

Applicable Compliance Method-

Compliance shall be based on the record keeping requirements as specified in B(III) above.

2. Formulation data or Method 24 of 40 CFR Part 60, Appendix A shall be used to determine the organic compound contents of the resins.

VI. Miscellaneous Requirements

None.